

BEFORE THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 Region III
 1650 Arch Street
 Philadelphia, Pennsylvania 19103-2029

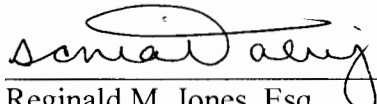
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 EPA REGION III, PHILA. PA

In The Matter of)	
)	
WCS Construction, LLC)	
William C. Smith & Co., and)	
880 New Jersey Avenue, LLC,)	Proceeding to Assess Class II Penalty
1100 New Jersey Avenue, SE)	Under Section 309(g) of the Clean Water
Suite 1000)	Act, 33 U.S.C. § 1319(g)
Washington, D.C. 20003,)	
)	
Respondents.)	Docket No.: CWA-03-2015-0112
)	
Property Located at:)	
880 New Jersey Avenue, SE)	
Washington, D.C. 20003)	
_____)	

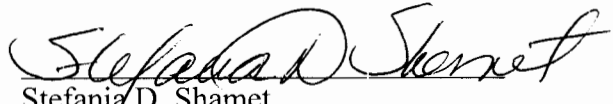
JOINT STATUS REPORT AND JOINT MOTION FOR EXTENSION OF TIME

The parties, through counsel, hereby submit this Joint Status Report and Joint Motion for Extension of Time. The parties report that they have reached an agreement in principle and are in the process of reducing that agreement in principle to writing. Pursuant to the Court's Order dated May 27, 2015, Respondents currently must respond to the Complaint filed in this matter by June 30, 2015. In light of the foregoing, the parties respectfully request that Respondents be given an additional 30 days to July 30, 2015, to respond to the Complaint filed in this matter and request a hearing.

Respectfully submitted,



 Reginald M. Jones, Esq.
 Sonia Tabriz, Esq.
 Fox Rothschild, LLP
 COUNSEL FOR RESPONDENTS



 Stefania D. Shamet
 Senior Assistant Regional Counsel
 U.S. Environmental Protection Agency
 Region III
 COUNSEL FOR COMPLAINANT

Date: June 23, 2015

Date: 6/26/15

CERTIFICATE OF SERVICE

I hereby certify that on this date I caused the foregoing Joint Status Report and Joint Motion for Extension of Time in *In re WCS Construction, LLC, William C. Smith & Company, and 880 New Jersey Avenue, LLC* Docket No. CWA-03-2015-0112 to be served in the following manner:

By Hand (Original and one copy):

Regional Hearing Clerk
U.S. Environmental Protection Agency
Region III 3RC00
1650 Arch Street
Philadelphia, PA, 19103

By Electronic Mail & First Class Mail

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COUNSEL FOR RESPONDENTS

Dated: 6/24/15


Stefania D. Shamet