

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VII

07 SEP -6 PM 2:49
ENVIRONMENTAL PROTECTION
AGENCY-REGION VII
REGIONAL HEARING CLERK

IN THE MATTER OF)
)
Larry Neff Management and Development,)
Inc.,)
)
Respondent)
_____)

Docket No. TSCA-07-2007-0024

MOTION FOR EXTENSION OF TIME TO ANSWER

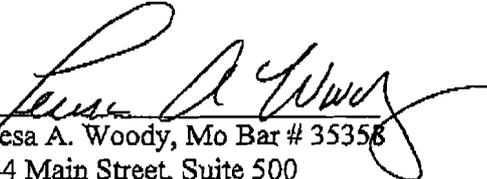
Respondent Larry Neff Management and Development, Inc. requests an extension of time of thirty days, until October 10, 2007, to answer the Complaint, Notice of Proposed Penalty and Notice of Opportunity for Hearing.

In support of this motion, Respondent states that the undersigned counsel was engaged to represent Respondent on September 4, 2007, and has not yet had a full opportunity to review the file and consult with Respondent in order to prepare an answer to defend against the charges in the Complaint. One extension was obtained previously, until September 10, 2007, but Respondent was not at that time represented by the undersigned. Jonathan Meyer, Assistant Regional Counsel for the United States Environmental Protection Agency, has been consulted and does not object to this extension of time. This request is not made for the purpose of undue delay, but in order to allow Respondent's counsel to fully review the record and consult with Respondent to protect Respondent's rights and answer fully.

For the reasons set forth above, Respondent requests an extension until October 10, 2007, in which to answer the Complaint, Notice of Proposed Penalty and Notice of Opportunity for Hearing.

Respectfully submitted,

THE WOODY LAW FIRM PC

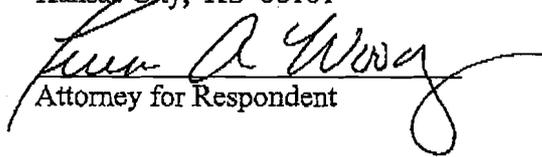
By: 
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ATTORNEY FOR RESPONDENT

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served by United States mail, postage prepaid, this 6th day of September, 2007, on:

Jonathan Meyer
Assistant Regional Counsel
Region VII
U. S. Environmental Protection Agency
901 N. 5th Street
Kansas City, KS 66101


Attorney for Respondent



the woody law firm pc
TRIAL LAW

Teresa A. Woody teresa@woodylawfirm.com

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RE: LARRY NEFF MANAGEMENT & DEVELOPMENT

TO: MS KATHY RUBINSON

FAX #: 913-557-9567

TO: _____

FAX #: _____

TO: _____

FAX #: _____

TO: _____

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COMMENT: ATTACHED ARE RESPONDENT'S ENTRY OF
APPEARANCE AND MOTION FOR EXTRAJUDICIAL
TIME.

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