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DONALD A. HINES

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⁵ALSO CERTIFIED PUBLIC ACCOUNTANT
⁶ALSO LICENSED IN NORTH CAROLINA
⁷ALSO LICENSED BY U.S. PATENT AND TRADEMARK OFFICE
⁸ALSO LICENSED IN OHIO

July 22, 2008

E-mail: mperry@fraserlawfirm.com
DID: 517-377-0846

Regional Hearing Clerk (E-13J)
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, IL 60604

Re: **In the Matter of:** One Management, Inc., L & J Investment, Inc., and One
Management Investment Group, Detroit, Michigan
Docket No.: TSCA-05-2008-0012

Dear Clerk:

Enclosed herewith please find the original and one copy of its Unopposed Motion for Extension of Time to Respond to the Complaint, Affidavit of Counsel in Support of Motion for Extension of Time to Respond to Complaint, together with Proof of Service of same upon counsel of record.

Thank you.

Very truly yours,

FRASER TREBILCOCK DAVIS & DUNLAP, P.C.



Michael H. Perry

MHP:js

Enclosures

cc: Mary McAuliffe (w/enc.)
Scott Cooper (w/enc.)

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US EPA
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

In the Matter of:

**One Management, Inc.,
L & J Investment, Inc., and
One Management Investment Group,
Detroit, Michigan,**

Respondents.

Docket No.: TSCA-05-2008-0012

**RESPONDENTS' UNOPPOSED
MOTION FOR EXTENSION OF
TIME TO RESPOND TO THE
COMPLAINT**

Michael H. Perry (P22890)
Fraser Trebilcock Davis & Dunlap, P.C.
Attorneys for Respondent
124 W. Allegan, Suite 1000
Lansing, Michigan 48933
Telephone: (517) 482-5800
Fax: (517) 482-0887

NOW COME the Respondents One Management, Inc., L & J Investment, Inc., and One Management Investment Group, Detroit, Michigan, by and through their attorneys, Fraser Trebilcock Davis & Dunlap, P.C., and by way of an unopposed motion for an extension of time within which to respond to the Complaint in this matter, say as follows:

1. According to the first page of the 250 page Complaint in this matter, the Complaint was filed in the Office of the Regional Hearing Clerk on June 23, 2008. The Certificate of Service attached to the Complaint states that an original and one copy of the Complaint was sent by certified mail to the Respondents on that date.
2. Soon after June 23, 2008 the Respondents received copies of the Complaint and forwarded a copy thereof to the undersigned.
3. The response to the Complaint is due within 30 calendar days after its receipt. Although the undersigned presently lacks information regarding the specific date on which the Respondents received the Complaint, it is reasonably

estimated that the Respondents had received the Complaint on or about June 25, 2008. This means that the response to the Complaint is due on or about July 25, 2008.

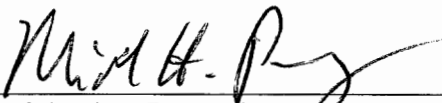
4. On Tuesday, July 22, 2008, the undersigned spoke with Ms. Mary McAuliffe, counsel for the Complainant in this matter and requested an extension of time within which to respond to the Complaint to August 15, 2008.
5. Ms. McAuliffe indicated that she would not oppose a motion for an extension of time to file the response on or before August 15, 2008.
6. The 250 page Complaint includes 861 separately numbered paragraphs and a number of pages thereafter regarding the proposed civil penalty for each of the 670 counts contained within the Complaint.
7. The undersigned is also counsel of record in a number of other non-US EPA related matters.
8. The undersigned has prepaid for a family vacation beginning on Friday, July 25, 2008 and will return his office on Tuesday, August 5, 2008.
9. The agreement of US EPA's counsel, Mary McAuliffe, particularly in light of the length and breadth of the Complaint, the undersigned's need to attend to other matters, and the undersigned's forthcoming prepaid vacation, are factors which justify the brief extension of time to August 15, 2008 to respond to the Complaint.

WHEREFORE, for the reasons stated above, the undersigned respectfully requests the entry of an Order granting the Respondents an extension to August 15, 2008 to respond to the Complaint.

Respectfully submitted,

FRASER TREBILCOCK DAVIS & DUNLAP, P.C.
Attorneys for Respondents

Dated: July 22, 2008

By: 
Michael H. Perry (P 22890)
124 W. Allegan, Suite 1000
Lansing, Michigan 48933
(517) 482-5800

FRASER
TREBILCOCK
DAVIS &
DUNLAP,
P.C.
LAWYERS
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MICHIGAN
48933

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

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In the Matter of:

One Management, Inc.,
L & J Investment, Inc., and
One Management Investment Group,
Detroit, Michigan,

Docket No.: TSCA-05-2008-0012

Respondents.

Michael H. Perry (P22890)
Fraser Trebilcock Davis & Dunlap, P.C.
Attorneys for Respondent
124 W. Allegan, Suite 1000
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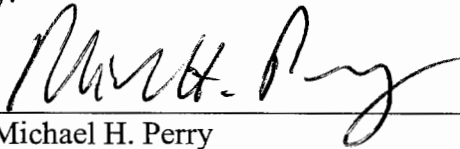
AFFIDAVIT OF COUNSEL IN SUPPORT OF MOTION FOR
EXTENSION OF TIME TO RESPOND TO COMPLAINT

STATE OF MICHIGAN)
) ss
COUNT OF INGHAM)

Michael H. Perry, being duly sworn deposes and says as follows:

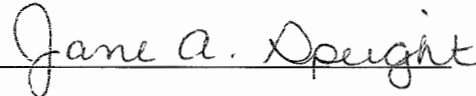
1. I am legal counsel for the Respondents in this matter.
2. I prepared the Respondents' Unopposed Motion for Extension of Time to Respond to the Complaint.
3. The facts stated in the Respondents' Unopposed Motion for Extension of Time to Respond to the Complaint are true.
4. In particular, on Tuesday, July 22, 2008, I had two brief telephone discussions with Ms. Mary McAuliffe during which Ms. McAuliffe stated, among other things, that she would not oppose a motion to extend the date for the Respondents to respond to the Complaint to August 15, 2008.

5. I have personal knowledge of the facts stated above and if called upon to testify could do so competently.



Michael H. Perry

Subscribed and sworn to before me
this 22nd day of July, 2008



JANE A. SPEIGHT
NOTARY PUBLIC - STATE OF MICHIGAN
COUNTY OF CLINTON
My Commission Expires Aug. 22, 2014
Acting in the County of Ingham

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

RECEIVED
OFFICE OF GENERAL COUNSEL
JUL 23 2008

In the Matter of:

**One Management, Inc.,
L & J Investment, Inc., and
One Management Investment Group,
Detroit, Michigan,**

Docket No.: TSCA-05-2008-0012

PROOF OF SERVICE

Respondents.

Michael H. Perry (P22890)
Fraser Trebilcock Davis & Dunlap, P.C.
Attorneys for Respondent
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Lansing, Michigan 48933
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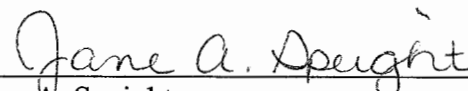
STATE OF MICHIGAN)
) ss.
COUNTY OF INGHAM)

Jane A. Speight, being first duly sworn, deposes and says that on this 22nd day of July, 2008, she served a copy of Unopposed Motion for Extension of Time to Respond to the Complaint, Affidavit of Counsel in Support of Motion for Extension of Time to Respond to Complaint upon the following individual(s):

Mary McAuliffe (C-14J)
Associate Regional Counsel
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, IL 60604

Mr. Scott Cooper (LC-8J)
Pesticides and Toxics Compliance Section
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, IL 60604

by placing the same in an envelope(s) addressed to said individual(s) at the aforesaid business address(es) and depositing same in the U.S. mail.


Jane A. Speight