

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2

U.S. ENVIRONMENTAL  
PROTECTION AGENCY-REG. II  
2008 JUL 25 PM 2:35  
REGIONAL HEARING  
CLERK

IN THE MATTER OF:

Palmas Lakes, Inc.  
P.O. Box 191334  
San Juan, Puerto Rico 00919

and

F&R Construction Corporation  
P.O. Box 9932  
San Juan, Puerto Rico 00908

Respondents

Docket No. CWA-02-2007-3410  
Proceeding Pursuant to Section 309(g) of  
The Clean Water Act, 33 U.S.C. §1319(g)  
to Assess Class II Civil Penalties

Harbour Lakes Residential Development  
NPDES GCP Number PRR10B567

**NOTICE OF APPEARANCE AND REQUEST FOR BRIEF EXTENSION  
TO FILE RESPONDENT'S INITIAL EXHANGES**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

COMES NOW the undersigned attorney and respectfully states as follows:

1. The undersigned attorney has recently filed notice of appearance in the captioned case, asking to be notified of all subsequent orders, resolutions, pleadings and other notices filed or issued hereunder.
2. PL hereby requests a brief extension to file its prehearing exchanges, which are currently due on July 21, 2008. This request is made for good cause.

3. First, the undersigned received Complainant's prehearing exchanges, including all attachments, on June 30 2008, that is, ten (10) days after they were due under the Prehearing Order. PL is currently reviewing the attached documents.

4. Also the undersigned must familiarize himself thoroughly with the facts and law of this case, meet with counsel for F & R and confer extensively with PL's principals.

5. Finally, Respondent PLL would also like to explore settlement possibilities with Complainant.

6. For the above reasons this respondent requests an extension of time until August 8, 2008 to comply with the pre-hearing exchanges.

7. Respondent respectfully submits that this request is made for good cause and will not cause prejudice to any party hereto.

**WHEREFORE**, it is most respectfully requested that this request be granted.

**RESPECTFULLY SUBMITTED.**

I HEREBY CERTIFY that on this same date copy of this motion has been mailed by certified mail to Silvia Carreño, Esq., Associate Regional Counsel, Caribbean Programs, Office of Regional Counsel, U.S. Environmental Protection Agency, Region 2, Centro Europa Suite 417, 1492 Ponce de León Ave., San Juan, Puerto Rico 00907-4127; Wanda García, P.E., Chief, Permit Section, Water Quality Division, Environmental Quality Board of PR, P.O. Box 11488, San Juan, PR 00910; and Hilda Quiñones, Esq., Adsuar Muñiz Goyco Seda & Pérez Ochoa,

P.S.C., at P.O. Box 70294, San Juan, PR 00936-8294; Karen Maples, Regional Hearing Clerk,  
US EPA, Region II, 290 Broadway, 17<sup>th</sup> Floor, New York, NY 10007-1866

In San Juan, Puerto Rico, this July 14<sup>th</sup>, 2008.



Ernesto F. Rodríguez Suris, Esq.

Tres Rios Building - Suite 300

#27 Gonzalez Giusti Ave.

San Patricio

Guaynabo PR 00968

Tel. (787) 758-8703

Fax: (787) 759-6768

efrodriguez@prtc.net