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September 1, 2015

Via Federal Express

Office of Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 2
290 Broadway, 16th Floor
New York, NY 10007-1866

U.S. Environmental
Protection Agency-Reg 2
2014 SEP -2 AM 10: 31
REGIONAL HEARING
CLERK

Re: In the Matter of Cold Spring Fish and Supply Co.,
Docket No. CWA-02-2015-3315

Dear Sir/Madam:

I am enclosing herewith for filing an original and two copies of a Joint Motion for Extension of Time to File the Answer and Certificate of Service.

Please file the original documents and return filed, date-stamped copies of each to me in the self-addressed, stamped envelope provided.

Thank you for your courtesies in this matter.

Very truly yours,

Handwritten signature of Richard M. Hluchan in black ink.
Richard M. Hluchan

RMH/amb
Enclosures

cc: Helen S. Ferrara, Regional Judicial Officer (w/encls.) – via Federal Express
Chris Saporita, Esq. (w/encls.) – via E-Mail Saporita.Chris@epa.gov and Federal Express

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2

REGIONAL HEARING
CLERK
2015 SEP - 2 AM 10:31
U.S. Environmental
Protection Agency-Reg 2

In the Matter of:)
)
)
Cold Spring Fish and Supply Co.) Docket No. CWA-02-2015-3315
)
)
Respondent.)
)

**JOINT MOTION FOR EXTENSION OF TIME
TO FILE THE ANSWER**

The complaint in the above matter was filed by Complainant, United States Environmental Protection Agency ("EPA") on August 13, 2015, and received by Respondent on August 15, 2015. Therefore, Respondent's answer is due on or before September 14, 2015.

On Tuesday, September 1, 2015, the parties held a telephone conference to discuss settlement of the matter without a hearing. The parties scheduled another telephone conference to attempt to reach a settlement on September 10, 2015.

Both parties anticipate that they will be able to resolve this matter through settlement, and agreed to jointly move for an extension of time for Respondent to file the answer. Therefore, on behalf of the parties, Respondent hereby requests a 60-day extension of the date to file an answer, so the answer would be due on November 13, 2015.

Respectfully submitted by


Richard M. Hluchan
HYLAND LEVIN LLP
6000 Sagemore Drive, Suite 6301
Marlton, NJ 08053
(856) 355-2999

Dated: September 1, 2015

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2**

In the Matter of:)
)
Cold Spring Fish and Supply Co.) **Docket No. CWA-02-2015-3315**
)
Respondent.)

CERTIFICATE OF SERVICE

I certify that the foregoing **Joint Motion for Extension of Time to File the Answer**, dated September 1, 2015, was sent this day in the following manner to the addresses listed below:


Original and One Copy Office of Regional Hearing Clerk
By Federal Express: U.S. Environmental Protection Agency, Region 2
290 Broadway, 16th Floor
New York, NY 10007-1866

Copy By Federal Express: Helen S. Ferrara, Regional Judicial Officer
U.S. Environmental Protection Agency, Region 2
290 Broadway
New York, NY 10007-1866

Copy By Federal Express: Chris Saporita, Esq., Assistant Regional Counsel
Water and General Law Branch
Office of Regional Counsel
U.S. Environmental Protection Agency, Region 2
290 Broadway, 16th Floor
New York, NY 10007-1866

Copy By Email: Chris Saporita, Esq., Assistant Regional Counsel
Water and General Law Branch
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U.S. Environmental Protection Agency, Region 2
290 Broadway, 16th Floor
New York, NY 10007-1866
Saporita.Chris@epa.gov

Dated: September 1, 2015



Anna Benckert, Secretary
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