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EPA ORC *WS*
Office of Regional Hearing Clerk

February 6, 2013

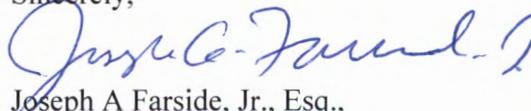
Wanda Santiago, Regional Hearing Clerk
U.S. Environmental Protection Agency, Region I
5 Post Office Square, Suite 100
Mailcode ORA 18-1
Boston, MA 02109-3912

Re: In the Matter of Maritime International, Inc., Docket Nos. CAA-01-2102-0106, CERCLA-01-2012-0107, EPCRA-01-2012-0108

Dear Ms. Santiago:

Enclosed please find a Third Assented-To Motion for Extension of Time to Answer with regard to the above-captioned action. The current date for Respondents to file their Answer is February 14, 2013. The Motion seeks an extension of 45 days to April 1, 2013.

Sincerely,



Joseph A Farside, Jr., Esq.,
on behalf of Respondents
Connecticut Freezers, Inc., and Maritime
International, Inc.

cc: Catherine Smith, Esq., EPA Region 1

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I

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In the Matter of:)
)
Connecticut Freezers, Inc. and)
Maritime International, Inc.)
)
1 Brewery Street)
New Haven, CT)
)
Respondents.)
)
Proceeding under Section)
113(d) of the Clean Air Act,)
42 U.S.C. § 7413(d); Section)
109(b) of the Comprehensive)
Environmental Response,)
Compensation, and Liability Act,)
42 U.S.C. § 9609(b); and Section)
325(b) of the Emergency Planning)
and Community-Right-to-Know Act,)
42 U.S.C. § 11045(b))

Docket Numbers
CAA-01-2012-0106
CERCLA-01-2012-0107
EPCRA-01-2012-0108

**THIRD ASSENTED-TO MOTION FOR EXTENSION OF TIME TO RESPOND TO
COMPLAINT AND NOTICE OF OPPORTUNITY FOR HEARING**

Respondents hereby move for an additional extension of time to file their Answer(s) in the above-captioned action. The current due date for the Answer is February 14, 2013. This Motion seeks an extension to forty-five (45) days after the Answer is currently due, or to April 1, 2013, for Respondents to file their Answer.

In support, Respondents submit that consultations with the EPA regarding a global settlement of this matter are ongoing. Additional time is necessary to achieve closure on these discussions without the need for further litigation in light of schedules both among essential Maritime personnel and its consultants, as well as essential personnel within EPA. Respondents and EPA have made substantial progress towards a potential resolution to date that would allow the parties to avoid litigation altogether. However, resolution of ability-to-pay issues is taking more time than either party initially anticipated. A 45-day extension of time will serve the important

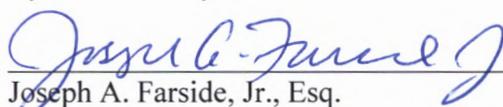
purpose of permitting Respondents and EPA to continue such progress with the real expectation that it will result in a global resolution within the extended time period.

Counsel for EPA has indicated that she is not opposed to the extension.

Respectfully submitted,

CONNECTICUT FREEZERS, INC. and
MARITIME INTERNATIONAL, INC.

By their attorneys,

A handwritten signature in blue ink, appearing to read "Joseph A. Farside, Jr.", is written over a horizontal line.

Joseph A. Farside, Jr., Esq.

EDWARDS WILDMAN PALMER LLP

111 Huntington Avenue

Boston, MA 02199

(617) 239-0100

(617) 227-4420 (Fax)

Date: February 6, 2013

In the Matter of Maritime International, Inc.

Docket Nos.:

CAA-01-2102-0106

CERCLA-01-2012-0107

EPCRA-01-2012-0108

CERTIFICATE OF SERVICE

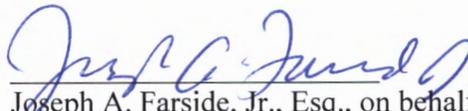
I hereby certify that the foregoing Third Motion to Extend Time to Answer was sent via Federal Express and filed with the Regional Hearing Clerk's office at the following address:

Wanda Santiago
Regional Hearing Clerk
U.S. Environmental Protection Agency, Region I
5 Post Office Square, Suite 100
Mailcode ORA 18-1
Boston, MA 02109-3912

and that a copy was sent to Complainant by first class mail and e-mail at the following address:

Catherine Smith, Esq.
EPA Region 1
Office of Environmental Stewardship
Mailcode OES 4-04
5 Post Office Sq., Suite 100
Boston, MA 02019-3912

Date: 2-6-13



Joseph A. Farside, Jr., Esq., on behalf of Connecticut Freezers, Inc., and Maritime International, Inc.