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April 29, 2011

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REGIONAL HEARING CLERK
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Office of the Regional Hearing Clerk
Attention: La Dawn Whitehead
US EPA, Region 5
77 W. Jackson Blvd.
Mail Code: E-19J
Chicago, IL 60604-3590

Re: In the matter of Schulze & Burch Biscuit Company
Docket No. CAA-05-2011-0034

Dear Regional Hearing Clerk:

Please find enclosed for filing one original and two copies of "Respondent's Motion to Extend Time to Answer or Otherwise Plead" in the above-referenced case. I would greatly appreciate your returning to me a file-stamped copy in the enclosed self-addressed stamped envelope. Thank you for your assistance.

Very truly yours,



Carey S. Rosemarin

cc: Marcy A. Toney
Regional Judicial Officer

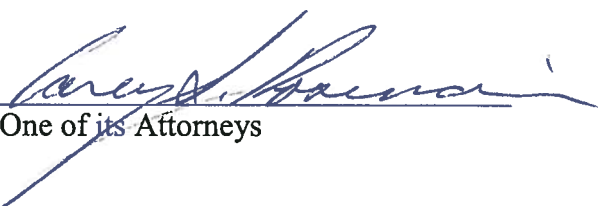
Ann L. Coyle
Associate Regional Counsel

3. In response to EPA's request, S&B devoted considerable effort to obtaining specified data and information, which it submitted to EPA on April 19, 2011 and April 28, 2011. As contemplated by the tentative settlement, S&B continues its efforts to draft proposals for Supplemental Environmental Projects, which are likely to result in significant environmental benefit.
4. S&B makes no admission of liability whatsoever. But in any event, the violations alleged by EPA involved neither environmental detriment nor economic benefit to S&B.
5. It is to the mutual benefit of EPA and S&B to allow additional time for the Parties to focus their efforts on finalizing their tentative settlement agreement, rather than furthering needless litigation.

WHEREFORE, S&B respectfully requests the Regional Judicial Officer to grant this Motion for Extension and enter an Order stating that S&B shall have until June 3, 2011 to answer or otherwise plead.

Dated: April 29, 2011

Respectfully submitted,
Schulze & Burch

By: 
One of its Attorneys

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Certificate of Service

I, Carey S. Rosemarin, hereby certify that on April 29, 2011, I caused the original and one copy of the foregoing document to be filed with the Regional Hearing Clerk, and true and correct copies of said document to be sent to the Regional Judicial Officer and Associate Regional Counsel of Record, all by next-day mail service, at the following addresses:

Office of the Regional Hearing Clerk
Attention: La Dawn Whitehead
US EPA, Region 5
77 W. Jackson Blvd.
Mail Code: E-19J
Chicago, IL 60604-3590

Marcy A. Toney
Regional Judicial Officer
US EPA, Region 5
77 W. Jackson Blvd.
Mail Code: C14-J
Chicago, IL 60604

Ann L. Coyle
Associate Regional Counsel
US EPA, Region 5
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