

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2

In the Matter of:

**MUNICIPALITY OF LAS PIEDRAS**  
P. O. Box 68  
Las Piedras, Puerto Rico 00771

**RESPONDENT**

Proceeding pursuant to Section 309(g)(2)(B) of  
the Clean Water Act, 33 U.S.C. § 1319(g)

PROCEEDING TO ASSESS A  
CLASS II CIVIL PENALTY

DOCKET NUMBER  
CWA-02-2009-3456

U.S. ENVIRONMENTAL  
PROTECTION AGENCY REGION 2  
2010 JUL -8 AM 10:37  
REGIONAL HEARING  
CLERK

**JOINT MOTION FOR CONTINUANCE**

**To the Honorable Court:**

COME NOW Complainant, the United States Environmental Protection Agency (EPA) and Respondent, the Municipality of Las Piedras, (collectively, the Parties) through the undersigned attorneys and very respectfully aver and pray as follows:

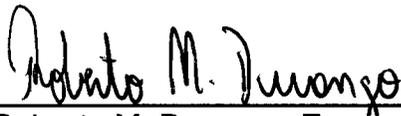
1. That on or about May 26, 2010, the Parties reached an agreement in principle, dispositive of all matters asserted in the Complaint.
2. That on June 1, 2010, Respondent signed the Consent Agreement and Final Order (CA/FO), memorializing such agreement in principle. See Exhibit A.
3. That Complainant in this matter must follow the proper channels to secure concurrence and approval of the above-referenced CA/FO.
4. That the Parties believe that a period of thirty days will be adequate to allow Complainant to complete such procedures and file a fully-executed CA/FO with this Honorable Court.

5. That the Parties believe that settlement of the matter at hand would promote procedural economy, avoiding the delays and costs resulting from the upcoming administrative hearing, in the interest of both Parties.

WHEREFORE, the Parties respectfully request a stay of the proceedings in this matter for a period of thirty days—until Tuesday, July 6, 2010—in order to file a fully-executed CA/FO with this Honorable Court.

RESPECTFULLY SUBMITTED in San Juan, Puerto Rico, this 3rd day of June, 2010.

**ATTORNEY FOR COMPLAINANT**



Roberto M. Durango, Esq.  
Assistant Regional Counsel  
U. S. EPA, Region 2  
Centro Europa Building – Suite 417  
1492 Ponce de León Ave.  
San Juan, Puerto Rico 00907-4127  
Tel. 787-977-5822  
Fax 787-729-7748  
E-mail: [durango.roberto@epa.gov](mailto:durango.roberto@epa.gov)

**ATTORNEY FOR RESPONDENT**



Germán A. González, Esq.  
Attorney for Respondent  
Luisa St. # 61, Suite 1-A  
San Juan, Puerto Rico 00907  
Tel. 787-723-3234  
Fax 787-723-3234  
E-mail: [eticorpo@yahoo.com](mailto:eticorpo@yahoo.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on this day I have caused to be sent the foregoing **Joint Motion for Continuance**, dated June 3, 2010, and bearing the above-referenced docket number, in the following manner to the respective addressees below:

Copy by **Overnight** to:

**Judge Barbara A. Gunning**  
Administrative Law Judge  
Office of Administrative Law Judges  
U.S. Environmental Protection Agency  
Franklin Court Building  
1099 14<sup>th</sup> Street, N.W., Suite 350  
Washington, D.C. 20460  
Ph: 202.564.6255 / Fax (202) 565-0044

Original and copy by **Overnight** to:

**Karen Maples**  
Regional Hearing Clerk  
Region 2  
U.S. Environmental Protection Agency  
290 Broadway, 16<sup>th</sup> Floor  
New York, NY 10007-1866.

Copy by **E-mail (pdf)** to:

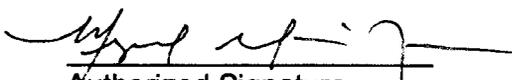
**Germán A. González, Esq.**  
Attorney for Respondent  
Luisa St. # 61, Suite 1-A  
San Juan, Puerto Rico 00907  
Tel. 787-723-3234  
Fax 787-723-3234  
E-mail: [eticorpo@yahoo.com](mailto:eticorpo@yahoo.com)

Date: 6/3/2010

  
\_\_\_\_\_  
Aileen Sanchez  
Office of Regional Counsel

**FOR RESPONDENT:**



BY:   
Authorized Signature

NAME: Honorable Miguel A. Lopez Rivera  
Mayor  
Municipality of Las Piedras  
P. O. Box 68  
Las Piedras, PR 00771

TITLE: Mayor

DATE: Junio 1, 2010