FILED UNITED STATES ENVIRONMENTAL PROTECTION AGENQY MOEC 22 MM 10: 35 REGION 6 DALLAS, TEXAS REGION VI

IN THE MATTER OF:

WALDO, ARKANSAS

DOCKET NO. EPCRA-06-2015-0502

RESPONDENT

LUDWIG, INC.

MOTION FOR EXTENSION OF TIME TO RESPOND

Respondent Ludwig, Inc. states the following for its Motion for Extension of Time:

- 1. Complainant Environmental Protection Agency filed a Complaint and Notice of Opportunity for Hearing in this docket on November 26, 2014.
- Complainant perfected service on December 9, 2014, resulting in a January 8,
 2015, due date for an answer by respondent.
- 3. Counsel for respondent conferred with counsel for complainant prior to filing this motion to determine complainant does not contest an extension of time until February 9, 2015, for respondent to file an answer.

4. Respondent affirmatively states it intends to propose a settlement agreement to complainant, but requires additional time to do so.

5. For these reasons, respondent requests an order pursuant to 40 C.F.R. § 22.7(b) extending the time for respondent to file an answer to February 9, 2015.

WHEREFORE, respondent requests that the Judicial Officer grant this Motion for Extension of Time to Respond, and for all other relief to which it may be entitled.

Respectfully submitted,

By:

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Ross Noland, Ark. Bar No. 06334 McMath Woods P.A. 711 W. Third Street Little Rock, AR 72201 Tel. 501-396-5400 ross@mcmathlaw.com

CERTIFICATE OF SERVICE .

I hereby certify that on December 18, 2014, I served copy of this document via US and electronic mail to:

Brian Tomasovic Office of Regional Counsel (6RC-ER) U.S. Environmental Protection Agency, Region 6 1445 Ross Ave., Suite 1200 Tomasovic.brian@epa.gov

Ross Noland