

Michael Boucher
Steptoe LLP
1330 Connecticut Avenue, NW
Washington, D.C. 20036
mboucher@steptoe.com
(202) 429-8020
Counsel for U.S. Jaclean, Inc.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 9
75 HAWTHORNE STREET
SAN FRANCISCO, CALIFORNIA 94105**

_____)	
In the Matter of:)	Docket No. FIFRA-09-2024-0043
))
U.S. Jaclean, Inc.)	RESPONDENT'S UNOPPOSED
)	MOTION FOR EXTENSION OF TIME
Respondent.)	TO ANSWER COMPLAINT
_____)	

Under subsection 22.7(b) of the Consolidated Rules of Practice, 40 C.F.R. § 22.7(b), Respondent U.S. Jaclean, Inc. (Respondent) respectfully requests the Regional Judicial Officer to extend Respondent's deadline to answer the complaint in this matter (Complaint) by 21 days, from April 24, 2024 to May 15, 2024. In support of its request, Respondent states as follows:


1. On March 21, 2024, Complainant Region 9 of the U.S. Environmental Protection Agency (Complainant) filed the Complaint.
2. On March 25, 2024, Respondent received a copy of the Complaint by certified mail at Respondent's headquarters office in Gardena, California.
3. Under subsection 22.15(a) of the Consolidated Rules of Practice, 40 C.F.R. § 22.15(a), Respondent's answer to the Complaint (Answer) is currently due within 30 days of March 25, 2024, i.e., by April 24, 2024.

4. On April 12, 2023, Respondent engaged Steptoe LLP as counsel in this matter. At present, Respondent has only a limited understanding of the scope, nature, and complexity of the factual and legal allegations contained in the Complaint. Although Respondent is diligently investigating all of the allegations in the Complaint, this work started only recently and is ongoing. As a result, Respondent is not yet in a position to begin preparing its Answer. The Regional Judicial Officer's granting this unopposed Motion will allow Respondent sufficient time to fully investigate all of the allegations in the Complaint and to prepare and submit an accurate and complete Answer.

On April 15, 2024, prior to filing this Motion, the undersigned counsel for Respondent contacted Brian Riedel, counsel for Complainant, and Mr. Riedel stated that Complainant does not oppose this Motion.

For the reasons set forth above, Respondent respectfully requests the Regional Judicial Officer to extend Respondent's deadline to file its Answer by 21 days, from April 24, 2024 to May 15, 2024.

U.S. JACLEAN, INC.

By: 

Michael Boucher
Counsel for Respondent

Dated: April 18, 2024

In the matter of U.S. Jaclean, Inc.
Docket No. FIFRA-09-2024-0043

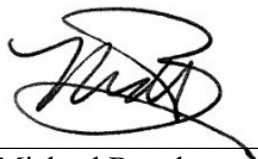
CERTIFICATE OF SERVICE

I certify that I delivered the foregoing Respondent's Unopposed Motion for Extension of Time to Answer Complaint to the following recipients by electronic mail, at the electronic mail addresses indicated:

Carol Bussey
Assistant Regional Counsel
U.S. Environmental Protection Agency, Region 9
75 Hawthorne Street
San Francisco, CA 94105
E-mail: bussey.carol@epa.gov

Ponly Tu
Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 9
75 Hawthorne Street
San Francisco, CA 94105
E-mail: R9HearingClerk@epa.gov

Dated: April 18, 2024

By: 
Michael Boucher