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**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 AMENDED AND
)	UNOPPOSED MOTION FOR EXTENSION
Respondent.)	OF TIME 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 attempted to contact counsel for Respondent, Carol Bussey. This attempted contact was responded to by Brian Riedel, counsel for Complainant. Mr. Riedel and the undersigned counsel met virtually on April 15, 2024. In that virtual meeting, Mr. Riedel reported that Ms. Bussey was out of the office and unavailable. In addition, he stated that Complainant did 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 19, 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 Amended and Unopposed Motion for Extension of Time to Answer Complaint to the following recipients by electronic mail, at the electronic mail addresses indicated:

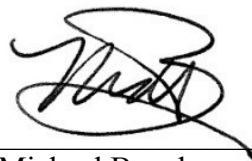
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Dated: April 19, 2024

By:



Michael Boucher