

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I**

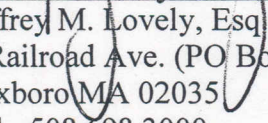
In the Matter of:)	Docket No. TSCA-01-2008-0045
)	
Daniel J. Lynch and)	
Grace K. Lynch)	
One Main Street)	
Foxboro MA 02035)	
)	
Respondents.)	
)	
Proceeding under Section 16(a) of the)	
Toxic Substances Control Act,)	
15. U.S.C. §2615(a))	

MOTION TO EXTEND TIME TO ANSWER

Pursuant to 40 C.F.R. § 22.7(b), Respondents Daniel J. Lynch and Grace K. Lynch respectfully request a 30 day extension to May 15, 2008 to file a written Answer to the Complainant's Administrative Complaint in this action. As grounds for this motion, Respondents state as follows:

1. Respondents intend to enter into a settlement with EPA and to incorporate a Supplemental Environmental Project ("SEP") as part of said settlement.
2. Respondents require additional time to gather information regarding the SEP to be proposed, including specifications, timing, and cost, to confirm that the SEP proposal conforms to applicable regulations, and to negotiate a final settlement.
3. Respondents are not aware of any prejudice to the interests of the Complainant.
4. Attorney John Kilborn, Senior Counsel for the Complainant, has indicated that the Complainant will not oppose the instant motion.

Respectfully submitted,
Respondents, by their attorney,



Jeffrey M. Lovely, Esq.
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Foxboro MA 02035
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Email: jml4844@aol.com

Date: April 4, 2008

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion to Extend Time to Answer has been sent to the following persons on the date noted above:

Original and
one copy, by first class mail:

Ms. Wanda Santiago
Regional Hearing Clerk
U.S. EPA, Region I
One Congress Street, Suite 1100 (RAA)
Boston, MA 02114-2023

One copy, by first class mail:

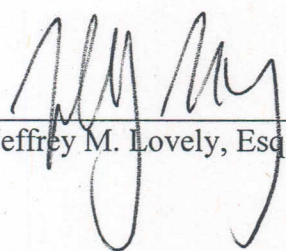
Joel Blumstein, Enforcement Manager
U.S. EPA, Region I
One Congress Street, Suite 1100
Boston, MA 02114-2023

One copy, by first-class mail:

John W. Kilborn, Senior Enforcement Counsel
U.S. EPA, Region 1
One Congress Street, Suite 1100 (SES)
Boston, MA 02114-2023

One copy, by first-class mail:

Daniel J. Lynch, individually and
As Executor of the Estate of Grace K. Lynch
One Main Street
Foxboro MA 02035



Jeffrey M. Lovely, Esq.