

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2

U.S. Environmental  
Protection Agency-Reg 2  
2014 AUG 25 AM 11:30  
REGIONAL HEARING  
CLERK

In the Matter of: )  
)  
Jane Casler, d/b/a Casler Farm, )  
)  
Respondent. )

Docket No. CWA-02-2014-3305

**JOINT MOTION FOR SECOND EXTENSION  
OF TIME TO FILE THE ANSWER**

The complaint in the above matter was filed by Complainant, United States Environmental Protection Agency ("EPA") on June 24, 2014, and received by Respondent on June 27. Accordingly, Respondent's answer was due on or before July 28, 2014. By joint motion, dated July 10, 2014, the parties requested an extension of time of 30 days for Respondent to file her answer. That motion was granted on July 16, 2014, and, accordingly, the answer is now due on August 27, 2014.

Since their initial telephone conference on Monday, July 7, 2014, the parties have been regularly and productively communicating about the final form of the settlement. In particular, the parties have agreed in principle on a cash penalty and Supplemental Environmental Project ("SEP"), but are still trying to find a third party to act as the beneficiary of the easement contemplated as part of the SEP.

Both parties anticipate that they will be able to resolve this final issue within the next two weeks, at which time they will draft a Consent Agreement and Final Order to memorialize the settlement. Therefore, on behalf of the parties, Complainant hereby moves for a 30-day extension of the date to file an answer, so the answer would be due on September 26, 2014.

Respectfully submitted by



Chris Saporita  
Assistant Regional Counsel  
U.S. Environmental Protection Agency  
290 Broadway  
New York, NY 10007  
212-637-3203

Dated: August 22, 2014

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2

In the Matter of: )

Jane Casler, d/b/a Casler Farm, )

Respondent. )

Docket No. CWA-02-2014-3305

CERTIFICATE OF SERVICE

I certify that the foregoing **Joint Motion for Extension of Time to File the Answer**, dated August 22, 2014, was sent this day in the following manner to the addressees listed below:

Original and One Copy  
By Hand:

Office of Regional Hearing Clerk  
U.S. Environmental Protection Agency, Region 2  
290 Broadway, 16th floor  
New York, New York 10007-1866

Copy By Hand:

Helen S. Ferrara  
Regional Judicial Officer  
U.S. Environmental Protection Agency, Region 2  
290 Broadway  
New York, NY 1007-1866

Copies by First Class Mail:

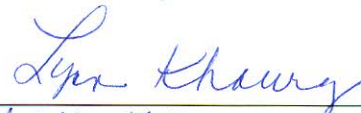
Jane Casler  
691 Babcock Hill Road  
West Winfield, NY 13491

Timothy Wimmer  
Resource Conservation Specialist  
Oneida County SWCD  
121 Second Street  
Oriskany, NY 13424

Copy by Email:

Timothy Wimmer  
Resource Conservation Specialist  
Oneida County SWCD  
tim-wimmer@oneidaswcd.org

Dated: August 25, 2014

  
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LYNN KHOURY  
Secretary  
U.S. Environmental Protection Agency  
290 Broadway  
New York, NY 10007