

2015 MAY 26 PM 2: 10

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May 21, 2015

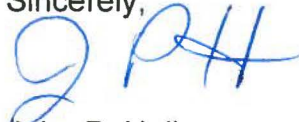
Regional Hearing Clerk  
U.S. Environmental Protection Agency  
Region 7  
11201 Renner Boulevard  
Lenexa, KS 66219

Re: Docket #TSCA-07-2015-0004  
In the Matter of Jill E. Nagel, d/b/a North-O Properties

Dear Clerk:

Enclosed please find for filing our Respondent's Motion for Extension of Time to Responsively Plead in the above-referenced case.

Sincerely,



John P. Heil  
FOR THE FIRM

JPH/slb  
Enclosure  
cc: Lucretia Myers, Attorney

DOCS/1442398.1

U. S. ENVIRONMENTAL PROTECTION AGENCY  
REGION 7  
11201 RENNER BOULEVARD  
LENEXA, KS 66219

UNITED STATES  
ENVIRONMENTAL PROTECTION  
AGENCY-REGION 7  
2015 MAY 26 PM 2: 10

BEFORE THE ADMINISTRATOR

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In the Matter of

Docket No. TSCA-07-2015-0004

Jill E. Nagel  
d/b/a North-O Properties  
1795 Kent Circle  
Papillion, Nebraska 68046

**RESPONDENT'S MOTION FOR  
EXTENSION OF TIME TO  
RESPONSIVELY PLEAD**

Respondent.

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Respondent Jill E. Nagel, by and through her attorneys, and requests an additional thirty days in which to respond to the Complaint filed herein and in which to request a hearing in this matter. As grounds for this Motion, Respondent states as follows:

1. Respondent has requested an informal telephone settlement conference at a mutually convenient time and date. The informal telephone settlement has now been scheduled for June 9, 2015.

2. Lucretia Myers, Esq., has informed Respondent's counsel that an Amended Complaint would be filed on May 22, 2015, and that such filing would extend the Answer date by 30 days. Lucretia Myers has also informed Respondent's counsel that she has no objection to a 30-day extension of Respondent's response deadline.

3. Additional time is needed for Respondent to investigate the claims of the Complaint.

4. No prejudice would occur if the deadline to respond to the Complaint were extended by 30 days.

5. No significant delay will be occasioned by this extension.

WHEREFORE, premises considered, the Responded moves the Hearing Officer to enter an order allowing it an additional 30 days in which to file its responsive pleading to the Complaint filed herein.

Dated May 21, 2015

JILL E. NAGEL (d/b/a NORTH-O  
PROPERTIES), Respondent

By: 

John P. Heil (#NE 11783)  
of BAIRD HOLM LLP  
1700 Farnam Street, Ste 1500  
Omaha, NE 68102-2068  
Phone: 402-344-0500  
Respondent's Attorneys

### CERTIFICATE OF SERVICE

I hereby certify that on this May 21, 2015, I filed the foregoing Motion for Extension with the Regional Hearing Clerk by U.S. Mail, and provided a true and correct copy by U.S. Mail to the following:

Lucretia Myers, Attorney  
Office of Regional Counsel  
U.S. Environmental Protection Agency  
Region 7  
11201 Renner Boulevard  
Lenexa, KS 66219

  
John P. Heil