

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I  
BEFORE THE PRESIDING OFFICER**

In the Matter of: ) **EPA Docket No. RCRA-01-2015-0052**  
)  
C.E. Bradley Laboratories, Inc. )  
56 Bennett Drive )  
Brattleboro, Vermont 05301 )

**ASSENTED-TO MOTION FOR EXTENSION OF TIME  
FOR RESPONDENT TO FILE ANSWER AND REQUEST HEARING**

Pursuant to 40 C.F.R. § 22.7(b), C.E. Bradley Laboratories, Inc. (“Respondent”) respectfully requests a 45-day extension (until December 15, 2015) for Respondent to file a written Answer and a Request for Hearing to the Administrative Complaint filed on October 1, 2015 by the EPA Region I Office of Environmental Stewardship’s Legal Enforcement Division (“Complainant”). As grounds for this motion, the Respondent states as follows:

1. On October 1, 2015, the Complainant filed its Administrative Complaint in this action.
2. On October 2, 2015, Complainant served Respondent’s President, Rashed Kanaan, with a copy of the Administrative Complaint and related case-opening papers.
3. Without an extension, Respondent’s Answer and Request for Hearing will be due no later than November 2, 2015.<sup>1</sup>
4. Counsel for Complainant and Respondent (collectively, the “Parties”) have spoken, and have expressed a shared interest in principle to pursuing discussions about achieving an expeditious settlement of this matter.

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<sup>1</sup> Respondent’s Answer and Request for Hearing, absent extension, would be due thirty (30) days following service of the complaint. Because the thirtieth day falls on Sunday, November 1, the actual response date is Monday, November 2, 2015, pursuant to 40 C.F.R. § 22.7(a).

5. To assist with their settlement discussions, representatives of the Parties are scheduled to meet on the afternoon of November 10, 2015 at the EPA Region I headquarters in Boston, Massachusetts.
6. An extension until December 15, 2015 is anticipated to provide the Parties with time to engage in meaningful settlement discussions.
7. Counsel for Complainant, Andrea Simpson, has been contacted regarding Respondent's request, and has noted her assent to the extension.

DATE: October 27, 2015

Respectfully submitted,

C.E. Bradley Laboratories, Inc.

By its attorneys,



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#### **CERTIFICATE OF SERVICE**

Pursuant to 40 C.F.R. §§ 22.5(a)(3), and in accordance with the Region's *Standing Order Authorizing Filing and Service by E-Mail in Proceedings Before the Region 1 Regional Judicial Officer* (October 9, 2014), I hereby certify that this day, October 27, 2015, a true and correct copy of this motion is being served on Complainant's counsel, Andrea Simpson, by electronic mail.



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Zachary R. Gates