

**UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
BEFORE THE ADMINISTRATOR**

In the Matter of:)	
)	
Taotao USA, Inc.,)	Docket No. CAA-HQ-2015-8065
Taotao Group Co., Ltd., and)	
Jinyun County Xiangyuan Industry Co., Ltd.)	
)	
Respondents.)	

**COMPLAINANT’S RESPONSE TO RESPONDENTS’ MOTION FOR LEAVE FOR
FILING POST HEARING BRIEF**

The Director of the Air Enforcement Division of the U.S. Environmental Protection Agency’s Office of Civil Enforcement (“Complainant”) files this response to Respondents’ “Motion for Leave for Filing Post Hearing Brief” filed by Respondents Taotao USA, Inc., Taotao Group Co., Ltd., and Jinyun County Xiangyuan Industry Co., Ltd. (collectively “Respondents”) on December 26, 2017 (“Motion”).

Complainant objects to Respondents’ continued failure in this Proceeding to follow specific directions and requirements provided in the Consolidated Rules and the Presiding Officer’s Orders. Complainant is concerned that Respondents’ long-standing pattern of failure to follow established procedures and rules will continue in this Proceeding if left unchecked.

With respect to the deadline of filing proper initial post-hearing briefs, Complainant had previously acquiesced to Respondents’ request for an extension of the original deadline by one week. Complainant is concerned that, if no opposition is made to the late filing, Respondents will come to expect that Complainant will continue to be held to the standard of practice and conduct required under the Consolidated Rules and the Presiding Officer’s Orders, while Respondents

may freely set their own standard based upon their own needs and priorities, and then obtain forgiveness afterward. Thus, Complainant opposes the Motion.

Complainant respectfully requests that, if the Presiding Officer does allow for the late filing of Respondents' Post-Hearing Brief, the Presiding Officer clarify for the record that Respondents' filed Initial Post-Hearing Brief is the version filed on December 26, 2017, and that Complainant need not address the version filed on December 23, 2017.

Respectfully Submitted,

1/4/18

Date

 For

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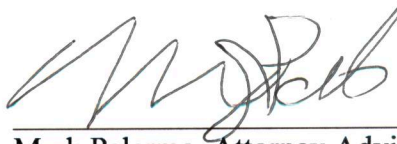
Date

 For

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CERTIFICATE OF SERVICE

I certify that the foregoing Complainant's Response to Respondents' Motion for Leave for Filing Post Hearing Brief ("Response") in the Matter of Taotao USA, Inc., et al., Docket No. CAA-HQ-2015-8065 was filed and served on the Presiding Officer this day through the Office of Administrative Law Judge's E-Filing System.

I certify the foregoing Response was sent this day by electronic mail to Respondents' counsel by electronic mail to Respondents' counsel: William Chu at wmchulaw@aol.com and Salina Tariq at stariq.wmchulaw@gmail.com.

1/4/18
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