UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 4

IN THE MATTER OF

Great Lakes Dredge & Dock Company, LLC

Docket No. MPRSA-04-2019-7500

Respondent.

Proceeding Pursuant to § 105(a) of the Marine Protection, Research and Sanctuaries Act, 33 U.S.C. § 1415(a)

GREAT LAKES DREDGE & DOCK COMPANY, LLC'S RESPONSE TO EPA'S MOTION FOR ENLARGEMENT OF TIME TO FILE PREHEARING EXCHANGE

Respondent Great Lakes Dredge & Dock Co., LLC ("Great Lakes") hereby responds to EPA's Motion for Extension of Time to File Prehearing Exchange that was filed on December 11, 2019.

EPA's motion is well-founded, and Great Lakes agrees that the deadlines for the Prehearing Exchanges should be extended. Great Lakes has filed a Motion to Dismiss the Complaint. EPA has filed a response in opposition to that motion, and Great Lakes' reply brief is due on December 23, 2019. If the Tribunal grants Great Lakes' Motion to Dismiss, it will resolve the case. Even if the Tribunal does not grant Great Lakes' motion in its entirety, its ruling could significantly affect the scope of the issues for the merits hearing. It would conserve the parties' resources to have the guidance of the Tribunal's ruling before exchanging exhibits for the merits hearing. An extension of time on the Prehearing Exchanges to allow the Tribunal

to rule on Great Lakes' Motion to Dismiss therefore would facilitate the efficient resolution of this matter.

Dated: December 13, 2019

Respectfully Submitted,

2A1.1,

T/Neal McAliley (Florida Bar No. 172091) Email: nmcaliley@carltonfields.com David Chee (Florida Bar No. 109659) Email: dchee@carltonfields.com **CARLTON FIELDS, P.A.** 100 S.E. Second Street, Suite 4200 Miami, Florida 33131-2113 Telephone: (305) 530-0050

Counsel for Respondent Great Lakes Dredge & Dock Co., LLC

CERTIFICATE OF SERVICE

I hereby certify that a copy of this document was sent by email on this date to Natalie Beckwith, Office of Regional Counsel, U.S. Environmental Protection Agency, Region 4, 61 Forsyth St., SW, Atlanta, Georgia 30303.

siel NeAlds T. Neal McAliley