

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY

BEFORE THE ADMINISTRATOR

In the Matter of)
)
FMC Corporation,) Docket No. FIFRA-03-2015-0248
)
Respondent.)

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UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE ANSWER

Pursuant to Rule 22.7(b) of the Consolidated Rules of Practice (40 C.F.R. § 22.7(b)), Respondent FMC Corporation (FMC) respectfully requests that the time for filing the Answer be extended 22 days until November 20, 2015. As good cause in support of this request, FMC states:

1. Under 40 C.F.R. § 22.15(a), FMC's answer is due within 30 days after service of the complaint. Service of the complaint is complete "when the return receipt is signed." 40 C.F.R. § 22.7(c).
2. Respondent signed the return receipt on September 29, 2015, and thus the Answer is currently due on October 29, 2015.
3. Respondent respectfully requests that the Regional Judicial Officer grant this Unopposed Motion For Extension Of Time To File Answer as FMC is diligently evaluating numerous factual allegations, some of which date back more than four years, including consulting personnel and researching records. The additional time would help facilitate availability of the relevant resources and precision of the Answer.

Before filing this Motion, the undersigned contacted counsel for the Environmental Protection Agency (EPA) and counsel advised that EPA does not oppose the Motion.

/s/ Kathryn E. Szmuszkovicz
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Dated: October 13, 2015

CERTIFICATE OF SERVICE

I certify that the foregoing Unopposed Motion For Extension of Time, dated, October 14, 2015, was sent this day in the following manner to the addressees listed below:

Original and one copy by USPS Certified Mail and E-mail to: Lydia Guy
Regional Hearing Clerk
U.S. EPA – Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Email: Guy.lydia@epa.gov

Copy by USPS Regular Mail and E-mail to: Attorney for Complainant
Jennifer M. Abramson (Mail Code 3RC50)
Senior Assistant Regional Counsel
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Copy by USPS Regular Mail and E-mail to: Joseph Lisa (Mail Code 3RC00)
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U.S. EPA Region III
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Email: Lisa.joseph@epa.gov

Denise R. Paul

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