

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C.**

In the Matter of:

**Taotao USA, Inc.,
Taotao Group Co., Ltd., and
Jinyun County Xiangyuan Industry
Co., Ltd.,**

Respondents.

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**Docket No.
CAA-HQ-2015-8065**

**RESPONDENTS' UNOPPOSED MOTION TO EXTEND DEADLINES FOR
RESPONDENTS' AND COMPLAINANT'S RESPONSIVE FILINGS**

Respectfully, Respondents' Taotao USA, Inc., Taotao Group Co., Ltd., and Jinyun County Xiangyuan Industry Co., Ltd., file this Unopposed Motion to Extend Deadlines for Responses (hereinafter "Responses") on the following motions (hereinafter "the Motions"), as well as the deadlines for replies to said Responses (hereinafter "Replies").

1. Complainant's Motion for Partial Accelerated Decision
2. Complainant's First Motion to Supplement the Prehearing Exchange
3. Respondents' Motion for Accelerated Decision
4. Respondent's Motion to Dismiss for Failure to State a Claim

The Motions were filed on Monday, November 28, 2016. Because all Motions were served via mail, the deadline to file Responses to the Motions is Monday, December 19, 2016. *See* 40 C.F.R. §§22.16(b) and 22.7(c).

Pursuant to 40 C.F.R. § 22.7(b), Respondents request that the deadlines for filing Respondents' and Complainant's Responses, as well as the Replies to said Responses to the Motions be extended as follows:

Tuesday, January 3, 2016

Deadline to File Responses

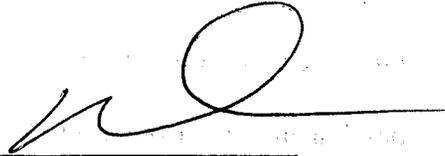
Friday, January 13, 2016

Deadline to File Replies

Respondents are required to file two Responses to two separate motions and are further preparing to respond to a request for Information requested by the Complainant. Respondents request this extension because since the filing, and receipt of, the Motions, Respondents' Counsel has been working on numerous other legal matters. The requested extension is short and does not prejudice Complainant because the extension will also extend the deadlines for Complainant's Responses and Replies. Furthermore, Complainant's counsel has been consulted, and does not oppose the request.

For the foregoing reasons, Respondents request that the deadline for filing Respondents' and Complainant's Responses to the Motions, as well as the subsequent Replies be extended.

Respectfully Submitted,



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wmchulaw@aol.com

12/15/16
Date

CERTIFICATE OF CONFERENCE

Counsel for the Respondents has confirmed that Counsel for Complainant, Edward Kulschinsky, is not opposed to this request for an extension, and is not opposed to the service of this Motion to Extend Deadlines via electronic mail.



Salina Tariq

CERTIFICATE OF SERVICE

This is to certify that the foregoing Unopposed Motion to Extend Deadlines for Respondents' and Complainant's Responsive Filings 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.

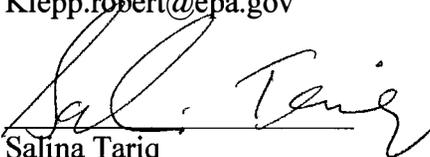
I certify that a copy of the foregoing Motion was sent this day via electronic mail for service on Edward Kulschinsky and Robert Klepp, counsels for Complainant, as follows:

Edward Kulschinsky
Kulschinsky.edward@epa.gov

Robert Klepp
Klepp.robert@epa.gov

12/15/16

Date



Salina Tariq