

UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY

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BEFORE THE ADMINISTRATOR

In Re )  
 )  
EUCLID OF VIRGINIA, INC. )  
 )  
Respondent )

Docket No. RCRA-3-2002-0303

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ENVIR. APPEALS BOARD

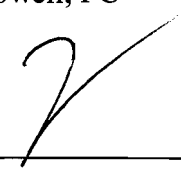
**RESPONDENT'S MOTION FOR EXTENSION OF TIME FOR SUBMISSION  
OF BRIEF ON APPEAL**

Respondent, Euclid of Virginia, Inc., hereby requests an extension of time of 60 days from December 9, 2006, that is, until February 7, 2007, pursuant to 40 CFR §22.7 on the grounds as follows:

1. The case involves an extensive analysis of many thousands of pages of record and also additional research and extensive drafting and review.
2. The issues in this case are in many instances novel.
3. This case has been pending since February 5, 2004 and it is respectfully submitted that a 60-day extension of time would not result in any prejudice to any party.

**WHEREFORE**, an extension of time is requested until February 7, 2007 within which to file the appeal brief.

Respectfully submitted,  
DeCaro & Howell, PC




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Thomas F. DeCaro, Jr.  
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14406 Old Mill Rd.  
Upper Marlboro, MD 20772  
301-464-1400/4776 phone/fax  
tfd@erols.com

**CERTIFICATE OF SERVICE**

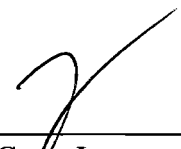
I, Thomas F. DeCaro, Jr. do hereby certify that on November 17, 2006, I did mail, via UPS Overnight, a copy of the foregoing Respondent's Motion for Extension of Time for Filing Initial Brief to:

Benjamin D. Fields  
Senior Assistant Regional Counsel  
Mail Code 3RC30  
US EPA - Region III  
1650 Arch St.  
Philadelphia, PA 19103-2029

Lydia Guy  
Regional Hearing Clerk  
US EPA - Region III  
1650 Arch St.  
Philadelphia, PA 19103-2029

U.S. Environmental Protection Agency  
Clerk of the Board, Environmental Appeals Board (MC 1103B)  
Ariel Rios Bldg.  
1200 Pennsylvania Ave. NW  
Washington, DC 20460-0001

U.S. Environmental Protection Agency  
Clerk of the Board, Environmental Appeals Board  
1341 G St. NW  
Washington, DC 20005

  
\_\_\_\_\_  
Thomas F. DeCaro, Jr.

UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY

BEFORE THE ADMINISTRATOR

In Re )  
 )  
EUCLID OF VIRGINIA, INC. ) Docket No. **RCRA-3-2002-0303**  
 )  
Respondent )

**ORDER GRANTING  
RESPONDENT'S MOTION FOR EXTENSION OF TIME FOR SUBMISSION  
OF BRIEF ON APPEAL**

Upon consideration of the Respondent's Motion for Extension of Time for Submission of Brief on Appeal, it is this \_\_\_\_\_ day of \_\_\_\_\_, 2006 hereby

**ORDERED** that the Motion be and hereby is GRANTED, and that the time for submission of the Respondent's Brief on Appeal is extended until February 7, 2007.

\_\_\_\_\_  
For the Administrator

copies to:

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