



## **UNOPPOSED MOTION FOR EXTENSION OF TIME**

Pursuant to 40 C.F.R. 124.19(g), Center for Food Safety, Friends of the Earth, Recirculating Farms, Tampa Bay Waterkeeper, Suncoast Waterkeeper, Healthy Gulf, Sierra Club Florida, the Center for Biological Diversity, and Food & Water Watch (collectively, Petitioners) file this Motion for Extension of Time for Petitioners' Reply to the Region's Response to Petitioners' Petition For Review due on December 21, 2020 (the Response). Due to the impending holiday schedule and conflicting court deadlines in January, Petitioners request a reasonable extension of 26 days to January 31, 2021 to more effectively reply to the Region.

### **Procedural History**

1. The Petition for Review in this matter was filed on October 30, 2020. Pursuant to 40 C.F.R. 124.19(b), the Region's Response to the Petition for Review was due on November 30, 2020.

2. On November 13, 2020, the Region contacted Petitioners requesting an extension for their Response to December 21, 2020, and Petitioners consented. The Region filed a Motion for Extension of Time, which was granted on November 18, 2020.

3. The Region's Response to the Petition for Review and a certified index to the administrative record is due on December 21, 2020. Pursuant to 40 C.F.R. § 124.19 (c)(2), Petitioners' Reply will be due 15 days later on January 5, 2021.

4. Petitioners' request for an extension of time is necessitated by the upcoming holiday season and existing court dates in January. Petitioners submit that the current schedule would substantially interfere with long-standing family commitments of some of the counsel involved in this matter related to the Christmas and New Year's holidays, and a summary judgment hearing already scheduled in January.

5. Petitioners have contacted counsel for the Region, and the Region does not object to the granting of this Motion.

Petitioners respectfully request that this Motion for Extension of Time be granted, and that Petitioners' deadline for filing a Reply to EPA's Response to the Petition be extended by 26 days, to January 31, 2021.

Respectfully submitted,

/s/ Meredith Stevenson

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*Attorneys for Petitioners*

## CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Motion for Extension of Time in the matter of Ocean Era, Inc.'s NPDES permit for Velella Epsilon were served by electronic mail, pursuant to the Revised Order Authorizing Electronic Service of Documents in Permit and Enforcement Appeals dated September, 21, 2020, on the following persons, this 18th day of December, 2020:

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