



The extension request is supported by several reasons. First, the travel and vacation schedules of counsel would make it very difficult to draft an amicus brief in the 15-day period immediately following February 14. Second, it would presumably be more helpful to the Board if the amicus brief takes into account the briefs that the Region and potentially others are expected to submit on February 14. Third, it is expected to be time-consuming to obtain agreement from potential amici who are expected to review a single amicus brief; an extension may help prevent submission to the Board of numerous (potentially redundant) amicus briefs. Fourth, this appeal involves complex issues and numerous parties. *See* Order at 2. Finally, an extension to March 27 would not delay the close of briefing or oral argument in this matter.

The amicus brief will be limited to 7,000 words, as provided by the rules. 40 C.F.R. § 124.19(d)(3).

The Municipal Committee contacted all other parties by email and requested their assent to this motion at approximately 2 p.m. on Friday, February 10. The Region, the Commonwealth of Massachusetts, the State of Connecticut, the Massachusetts Audubon Society, and C. Jeffrey Cook all assented to the motion. GE stated that it intends to oppose the motion. As of Tuesday morning, no response has been received from the Housatonic River Initiative and the Berkshire Regional Action Team.

The Municipal Committee respectfully requests that the Board grant this motion and extend the deadline for the submission of all amicus briefs to March 27, 2017.

February 14, 2017

Respectfully submitted,

Housatonic Rest of River Municipal Committee

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CERTIFICATE OF SERVICE

I certify that a copy of this motion has been sent to the counsel listed below.

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