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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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ENVIR. APPEALS BOARD

In the Matter of:

PEACE INDUSTRY GROUP (USA), INC.,
ZHEJIANG PEACE INDUSTRY AND
TRADE CO., LTD., CHONGQING
ASTRONAUTIC BASHAN MOTORCYCLE
MANUFACTURING CO., LTD., and BLUE
EAGLE MOTOR INC.,

Respondents.

CAA Appeal No. 16-01

MOTION FOR EXTENSION OF PAGE LIMIT


Complainant respectfully requests that the Environmental Appeals Board (“EAB”) grant a 15-page extension to the length limitations imposed on Complainant’s opening brief to be filed on behalf of the Environmental Protection Agency’s (“EPA’s”) Air Enforcement Division in the above-captioned matter. Complainant seeks this extension in order to have the space to thoroughly give a count-by-count description of the penalty policy calculations as requested in the EAB’s May 12, 2016 Order Electing to Exercise Sua Sponte Review and Establishing Briefing Schedule, as well as to adequately provide the EAB with enough detail on the issue of service. The mathematical formulas and tables necessary for clarity in describing the penalty calculations will benefit from different spacing than is typically used for narrative briefing.

Complainant believes that a 15-page extension will allow Complainant to provide an adequate response to the EAB’s Order and will not prejudice the Respondents.

For the reasons set forth above, Complainant respectfully requests that this Motion for Extension of Page Limit to respond to the EAB's Order be granted and that the EAB extend the brief length limitation to 35 pages.

Respectfully submitted,

June 10, 2016
Date


for Brianna Iddings, Attorney Adviser
Air Enforcement Division
Office of Civil Enforcement
Office of Enforcement and Compliance Assurance

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William J. Clinton Federal Building
Room 1142B, Mailcode 2242A
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CERTIFICATE OF SERVICE

I certify that the original and one copy of the foregoing Motion for Extension of Page Limit *In the Matter of Peace Industry Group (USA), Inc., et al.*, CAA-Appeal No. 16-01 was filed this day by hand delivery with the Environmental Appeals Board at the address listed below:

Clerk of the Board
U.S. Environmental Protection Agency
Environmental Appeals Board
1201 Constitution Avenue, NW
WJC East Room 3334
Washington, D.C. 20004

I certify that I sent, by United States Postal Service Certified Mail with return receipt requested, one copy of the foregoing Motion for Extension of Page Limit *In the Matter of Peace Industry Group (USA), Inc., et al.*, CAA-Appeal No. 16-01 to each of the following Respondents at the address below on the date below: Peace Industry Group (USA), Inc. and Blue Eagle Motor Inc.

G. Michael Smith
W. Anthony Collins, Jr.
Smith, Collins & Fletcher, P.A.
8565 Dunwoody Place, Building 15, Suite B
Atlanta, Georgia 30350

I certify that I sent, by United States Postal Service Certified Mail with return receipt requested, one copy of the foregoing Motion to each of the following Respondents at the address below on the date below: Zhejiang Peace Industry and Trade Co., Ltd. and Chongqing Astronautic Bashan Motorcycle Manufacturing Co., Ltd.

Quiping Wang
2649 Mountain Industrial Blvd.
Tucker, GA 30084

June 10, 2016

Date

for



Brianna Iddings, Attorney Adviser
Air Enforcement Division
Office of Civil Enforcement
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