



900 W. 48th Place, Suite 900, Kansas City, MO 64112 • (816) 753-1000

January 21, 2020

Via Federal Express

Adam R. Troutwine

(816) 572-4759  
atroutwine@polsinelli.com

Ms. Karen Maples  
Regional Hearing Clerk  
U.S. Environmental Protection Agency,  
Region 2  
290 Broadway, 16th Floor  
New York, New York 10007-1866

**Re: Motion for Extension of Time to File Answer  
In the Matter of Coast to Coast Circuits, Inc.  
Docket No.: RCRA-02-2019-7111**

Dear Ms. Maples:

Enclosed for filing please find Respondent's Motion for Extension of Time to File an Answer and proposed Order. Copies have been delivered via email to Regional Judicial Officer Helen Ferrara and Regional Counsel Stuart Keith. Should you have any questions or wish to discuss the enclosed pleadings, please do not hesitate to contact me.

Sincerely,

Adam R. Troutwine

Enclosure

cc: Stuart Keith, Assistant Regional Counsel, USEPA – Region 2

[polsinelli.com](http://polsinelli.com)

Atlanta Boston Chicago Dallas Denver Houston Kansas City Los Angeles Miami Nashville New York  
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Polsinelli PC, Polsinelli LLP in California

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 2

In The Matter of:

Coast to Coast Circuits, Inc.

Respondent

Proceeding Under Section 3008 of the Solid  
Waste Disposal Act, as amended

**Respondent's Unopposed Motion for  
Extension of Time to File Answer to  
Complaint**

Docket No. RCRA-02-2019-7111

**RESPONDENT'S UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO FILE ANSWER OR OTHERWISE RESPOND**

Respondent, Coast to Coast Circuits, Inc. ("Coast to Coast"), by and through its counsel, Polsinelli PC, and for their Motion for Extension of Time to File Answer, states as follows:

1. The Complaint for this matter was filed on or about September 27, 2019, and received by Coast to Coast on or about October 3, 2019.
2. Following an informal conference with U.S. EPA, Coast to Coast filed its first Motion for Extension of Time to File Answer on or about October 18, 2019, which was granted by the Regional Hearing Officer on or about October 30, 2019 and set a deadline for Coast to Coast to file an Answer of December 13, 2019.
3. Following the Regional Hearing Officer's Order Granting An Extension Of Time To File An Answer To The Complaint, Coast to Coast retained undersigned counsel and engaged in good faith settlement discussions with U.S. EPA to resolve this matter, consisting of Coast to Coast providing documentation and additional information to U.S. EPA concerning its ability to pay and addressing the underlying allegations in the Complaint.
4. On December 10, 2019, with the consent of counsel for U.S. EPA, Coast to Coast filed its second Motion for Extension of Time to File Answer, which was granted by the

Regional Hearing Officer on December 11, 2019 and set a deadline for Coast to Coast to file an Answer of January 27, 2020.

5. Coast to Coast and U.S. EPA are continuing to negotiate settlement of this matter in good faith, and Coast to Coast therefore respectfully requests an additional forty-five (45) days from the current deadline to file an Answer, up to and including March 12, 2020, to file an Answer or other responsive pleading to the Complaint. A proposed Order is attached as **Exhibit A**.

6. Coast to Coast has conferred with Assistant Regional Counsel for U.S. EPA and U.S. EPA is continuing to analyze the information provided by Coast to Coast in furtherance of settlement negotiations and, therefore, U.S. EPA concurs with this Motion.

WHEREFORE, Respondent, Coast to Coast Circuits, Inc., respectfully requests that this Honorable Regional Hearing Officer issue an order (a) granting Coast to Coast's motion for extension of time, (b) ordering that Coast to Coast have up to and including March 12, 2020 to file an Answer or submit responsive pleadings, and (c) granting such other and further relief as the Court deems just.

Dated: January 21, 2020

Respectfully submitted,

POLSINELLI PC

*/s/ Adam Troutwine*

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Adam Troutwine  
900 W. 48<sup>th</sup> Place, Suite 900  
Kansas City, MO 64112-1895  
(816) 572-4759  
atroutwine@polsinelli.com

**CERTIFICATE OF SERVICE**

I hereby certify that on January 21, 2020, the foregoing document was served on the parties as indicated below:

By First Class Mail and email:

Stuart Keith, Esq.  
Assistant Regional Counsel  
USEPA – Region 2  
290 Broadway, 16<sup>th</sup> Floor  
New York, New York 10007-1866  
Keith.stuart@epa.gov

*Attorney for USEPA*

*/s/ Adam Troutwine* \_\_\_\_\_

# EXHIBIT A

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 2

In The Matter of:

Coast to Coast Circuits, Inc.

Respondent

Proceeding Under Section 3008 of the Solid  
Waste Disposal Act, as amended

**Order Granting Motion for Extension  
of Time to File Answer to Complaint**

Docket No. RCRA-02-2019-7111

**ORDER**

Respondent's Motion for Extension of Time to Answer or otherwise respond is hereby granted and Respondent Coast to Coast Circuits, Inc. have until March 12, 2020 to file an Answer or file a responsive pleading to the Complaint in the above-referenced matter.

**SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
Regional Judicial Officer Helen Ferrara