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June 18, 2025

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED & E-MAIL

Ms. Helen Ferrara
Regional Judicial Officer
U.S. Environmental Protection Agency, Region 2
290 Broadway, 16th Floor (Room 1631)
New York, NY 10007-1866
Ferrara.Helen@epa.gov

**Re: In the Matter of Donjon Marine Co., Inc.
Docket No. MPRSA-02-2025-6001**

Dear Ms. Ferrara:

On behalf of Donjon Marine Co., Inc. ("Donjon"), in the above-referenced action, I am writing to respectfully request an additional 45-day extension of time to file an Answer and a Hearing Request, which currently is due by Thursday, June 19, 2025. As such, the new requested deadline to respond would be August 4, 2025.

The parties are continuing to make significant progress in resolving this matter and believe they are getting closer to settlement. However, as we will require some additional time to continue these negotiations, Donjon wishes to preserve its right to file an Answer and Hearing Request. As such, Donjon respectfully submits that good cause exists for this request. We have discussed this matter with counsel for EPA, and they do not have any objections to Donjon's request for the extension.

Please do not hesitate to contact me should you have any questions.

Very truly yours,



GAIL H. CONENELLO

Cc (via email):

Karen Maples, Regional Hearing Clerk

Zoe Oldham, Water and General Law Branch, EPA R2

Phyllis Feinmark, Manager, Water and General Law Branch, EPA R2

Patricia Pechko, Water Division, Dredging, Sediment and Ocean Section, EPA R2