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October 12, 2011

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REGIONAL HEARING CLERK  
U.S. ENVIRONMENTAL  
PROTECTION AGENCY

**Via Federal Express**

Regional Hearing Clerk (E-19J)  
U.S. EPA, Region 5  
77 West Jackson Boulevard  
Chicago, IL 60604

RE: In re the Matter of Babic Rental Ventures, LLC  
Belleville, IL

Dear Sir or Madam:

Enclosed please find an original and one copy of Motion for Additional Time, relative to the above-captioned matter.

Thank you.

Very truly yours,

  
Angela Davidson-Garlick

ADG:tad  
Enclosure  
cc: Mr. John Tielsch (w/enc.)

Original sent  
on 10-12-11  
via Federal  
Express

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5

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In the Matter of )  
)  
)  
Babic Rental Ventures, LLC ) Docket No. TSCA-05-2011-0018  
Belleville, Illinois, )  
)  
Respondent, )

**MOTION FOR ADDITIONAL TIME**

COMES NOW Respondent, Babic Rental Ventures, LLC, by and through counsel, Paul J. Evans and Angela Davidson-Garlick of the Evans Law Firm, P.C., and for and in support of its Motion for Additional Time, states as follows:

1. Respondent was served with EPA's complaint on September 14, 2011.
2. Respondent has been in ongoing settlement discussion with the EPA concerning this matter.
3. Due to the parties' ongoing discussions, Respondent was unaware that a Complaint was going to be filed.
4. Additionally, due to continued settlement discussion with the EPA after the Complaint was filed, Respondent believed no answer or other responsive pleading would need to be filed.
5. Respondent was informed by EPA counsel on Thursday, October, 6, 2011 that an answer would in fact need to be filed.
6. Due to the late date and Respondent's schedule, Counsel requests an additional 21 days to provide its responsive pleading or alternatively reach a resolution with the EPA.
7. Granting an additional amount of time in order for Respondent to file a response is necessary to protect Respondent's interests, is in good faith, and is not meant to harass or delay the judicial process.
8. Counsel for the Complainant has no objection to Respondent's request for additional time.

WHEREFORE, Respondent, BABIC RENTAL VENTURES, LLC, by and through its attorneys, Paul J. Evans and Angela Davidson-Garlick of the Evans Law Firm, P.C., pray this Court to enter an Order granting Respondent as additional 21 days to file its responsive pleadings to the EPA's Complaint and for such other relief as the Court deems just and reasonable.

Respectfully Submitted,




Paul J. Evans, #6201148  
Angela Davidson-Garlick, #6294944  
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#### CERTIFICATE OF SERVICE

Under penalties as provided by law, the undersigned certifies that a copy of the foregoing instrument was served upon each party, or attorney of record, by enclosing the same in an envelope addressed to each, at the address stated below, with postage fully prepaid, and by depositing said envelop in a U.S. Post Office mail box in O'Fallon, Illinois, prior to 5:00 p.m. on the 12<sup>th</sup> day of September, 2011.

Mr. John Tielsch,  
Counsel for Complainant/C-14J  
Region 5  
77 W. Jackson Blvd.  
Chicago, IL 60604-3590



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