

August 6, 2009

via facsimile; confirmation via Certified Mail

Ms. LaDawn Whitehead
Regional Hearing Clerk
Records Management Specialist
U.S. EPA Region 5 (E-193)
Office of Enforcement and Compliance Assurance
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Re: **In the Matter of paragon firstronic of NA Corp**
Motion for Extension of Time to File An Answer to Amended Complaint
Docket No. EPCRA 05-2008-0022

Dear Ms. Whitehead:

Enclosed for filing in the above matter please find Respondent's Motion for Extension of Time to File An Answer to Amended Complaint. We have discussed this extension with Harriet Croke, and she has no objection.

Sincerely,



Dennis J. Donohue

ka
enclosure
c Harriet Croke
Timothy Maclam
1694392

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**REGIONAL HEARING CLERK
U.S. ENVIRONMENTAL
PROTECTION AGENCY**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

In the Matter of:)
)
paragon firstronic of NA Corp.)
1655 Michigan Street, N.E.)
Grand Rapids, Michigan 49503)
)
Respondent.)
_____)

Docket No. EPCRA 05-2008-0022

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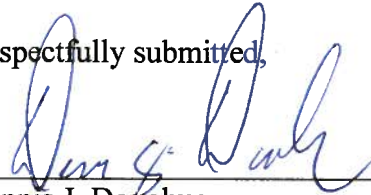
Motion for Extension of Time to File An Answer to Amended Complaint

The Respondent, by undersigned counsel, requests an additional 14 day extension of the time to file an answer to the Amended Complaint issued on June 25, 2009 and received by the Respondent on July 2, 2009. In support of this Motion, Respondent states:

1. The Administrator's Rules which govern this proceeding, 40 CFR 22, specifically, 40 CFR 22.7(b), provides that:
[T]he Presiding Officer may grant an extension of time for filing any document: upon timely motion of a party to the proceeding, for good cause shown, and after consideration of prejudice to other parties.... Any motion for an extension of time shall be filed sufficiently in advance of the due date so as to allow other parties reasonable opportunity to respond and to allow the Presiding Officer ...reasonable opportunity to issue an order."
2. Respondent and Complainant have engaged in settlement discussions. Because of the extraordinary press of business and travel demands of Respondent's management, Respondent has not been able to conclude the negotiations within the time frame articulated in the Joint Motion for Complaint Answer Time extension filed with this Tribunal on July 7, 2009. (That Motion set today, August 6, as the deadline for filing an answer to the Amended Complaint.)
3. Respondent continues to anticipate that it will reach a settlement agreement with Complainant resolving the Amended Complaint and avoid the need to file an answer.

4. Because the extension will facilitate further settlement efforts and because of the extenuating circumstances described in paragraph 2, Respondent believes there is good cause for the extension. Respondent has spoken with counsel for Complainant, who does not object to the extension. Therefore, there is no prejudice to Complainant in giving the requested extension.

Respectfully submitted,



Dated: August 6, 2009

Dennis J. Donohue
Warner Norcross & Judd LLP
Counsel for paragon firstronic of NA Corp.

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PROTECTION AGENCY**

Certificate of Service

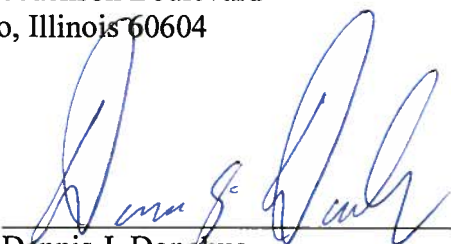
I certify that I filed the original and one copy of the Motion for Complaint Answer Time Extension ("Motion") in this matter with the Regional Hearing Clerk (E-19J), United States Environmental Agency, Region 5, 77 West Jackson Boulevard, Chicago, Illinois 60604, via Facsimile and mailed by Certified Mail, Receipt No. 7007 3020 0003 2244 7801, addressed as follows:

LaDawn Whitehead
Regional Hearing Clerk
Records Management Specialist
U.S. EPA – Region 5 (E-19J)
Office of Enforcement and Compliance Assurance
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

I served a copy of the Motion, via facsimile and First Class Mail, on:

Harriet Croke
(C-14J)
Office of Regional Counsel
U.S. EPA Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

On this 6th day of August, 2009.



Dennis J. Donohue
Counsel for paragon firstronic of NA Corp.