

**BEFORE THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION III**

**In the Matter of:** : **U.S. EPA Docket No. TSCA-03-2018-0063**

**Gregory Mull** :  
77 Mull Road :  
Middleburg, PA 17842 : **U.S. EPA-REGION 3-RHC**  
 : **FILED-25JUN2018pm1:47**

**Respondent** :

**RESPONDENT'S MOTION FOR EXTENSION OF TIME TO ANSWER EPA  
ADMINISTRATIVE COMPLAINT AND NOTICE FOF OPPORTUNITY FOR A  
HEARING**

Pursuant to the Consolidated Rules of Practice, 40 CFR Part 22, Respondent hereby moves for an extension of time of fifteen (15) days within which to file an Answer to EPA's Administrative Complaint and Notice of Opportunity for Hearing ("Complaint"). In support of this motion, Respondent states as follows:

1. This is Respondent's first request for an extension of time in which to Answer the Complaint.
2. Response to the Complaint is currently due on Monday, June 25, 2018, based on service of the complaint on Respondent on May 25, 2018.
3. Additional time is needed for preparation of an Answer because counsel was formally retained on June 20, and is still in the process of obtaining and reviewing all documents referred to in the Complaint, which are the subject of allegations therein.
4. Some of the documents required to be reviewed are not currently in the possession of Respondent, and will need to be obtained from previous counsel to Respondent or from EPA.
5. Respondent's counsel has communicated by email with EPA counsel; and she has indicated that we may represent that EPA would not object to such request.

WHEREFORE , Respondent respectfully moves for an extension of an additional fifteen (15) days within which to file its Answer to the Complaint.

Dated: June 21, 2019

By: 

Mitchell E, Burack  
Burack Environmental Law Office  
333 E. City Ave. Suite 300  
Bala Cynwyd, PA 19004  
(610) 660 7790

[MitchellBurack@BurackEnvironmentalLaw.com](mailto:MitchellBurack@BurackEnvironmentalLaw.com)

Counsel and Service Recipient for Respondent

**CERTIFICATE OF SERVICE**

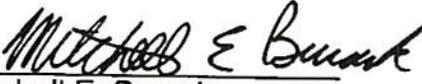
I, the undersigned hereby certify that on June 21, 2018, I caused an original and one true and correct copy of the foregoing Motion for extension of time to answer, to be served on the Regional Hearing Clerk, via hand delivery at:

Regional Hearing Clerk  
Mail Code 3RC00  
US EPA Region III  
1650 Arch St.  
Philadelphia, PA 19103-2029

U.S. EPA-REGION 3-RHC  
FILED-25JUN2018pm1:48

And one true and correct copy of the foregoing Motion for extension of time to answer, to be served on EPA counsel, via hand delivery at:

Donzetta Thomas  
Senior Assistant Regional Counsel (3RC50)  
USEPA Region III  
1650 Arch St.  
Philadelphia, PA 19103-2029

  
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Mitchell E. Burack  
Counsel for Respondent.