## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

#### **BEFORE THE ADMINISTRATOR**

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ENVIRONMERIAL PROTECTION Agency-region VII Regional Hearing Clerk

In the Matter of	
HOMKOR OF MISSOURI, INC.	
Respondent	

Docket No. TSCA-07-2006-0178

# MOTION AND SUGGESTIONS IN SUPPORT OF RESPONDENTS REQUEST FOR EXTENSION OF TIME

**COMES NOW** Respondent, Homkor of Missouri, Inc. ("Homkor"), pursuant to 40 C.F.R. § 22.7 and for the reasons and the grounds as set forth hereinbelow, moves for an extension of forty-five (45) days, up to and including July 24, 2006 to prepare, file and serve its Answer in this matter.

- 1. The Complaint in this matter was filed on May 9, 2006.
- 2. Respondent's Answer is currently due on June 9, 2006.

3. Counsel, who has entered their appearance in this cause, require additional time to conduct appropriate investigation of the facts underlying the EPA's claims, evaluate potential defenses to these claims, attempt to resolve this matter through an informal settlement conference and to a file full and complete Answer.

4. Mr. Chris Dudding of the EPA Office of Regional Counsel has authorized Respondent's counsel to represent in this Motion that the EPA has no objection to Respondent, Homkor's request for an extension of time.

5. The relief sought herein is submitted by Respondent, Homkor in good faith and not for the purpose of delay.

WHEREFORE, Respondent, Homkor respectfully requests an extension of forty-five

(45) days up to and including July 24, 2006 to file its Answer.

Respectfully submitted,

### THE SESSION LAW FIRM

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ATTORNEYS FOR RESPONDENT HOMKOR OF MISSOURI, INC.

#### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was sent via facsimile and

U.S. Mail, postage prepaid on this 2nd day of June, 2006 to:

Regional Hearing Clerk U.S. EPA - Region VII 901 North 5<sup>th</sup> Street Kansas City, Kansas 66101

Chris R. Dudding Office of Regional Counsel U.S. Environmental Protection Agency, Region 7 901 N. 5<sup>th</sup> Street Kansas City, Kansas 66101

Shawna M. Bligh