

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I

RECEIVED

NOV 28 2012

EPA ORC
Office of Regional Hearing Clerk

In the Matter of:)

JP Lillis Enterprises, Inc.,)
d/b/a Cape Cod Ice)
1 Noyes Avenue)
East Providence, Rhode Island 02860)

Respondent)

Proceeding under Section 113(d) of)
the Clean Air Act, 42 U.S.C. § 7413(d))
_____)

DOCKET NO. CAA-01-2012-0115

MOTION TO ENLARGE TIME
TO FILE ANSWER

Now comes the Respondent, JP Lillis Enterprises, Inc. (d/b/a Cape Cod Ice) through counsel, who respectfully requests a further extension to file an Answer to the Administrative Complaint served upon it on October 1, 2012. Respondent's Answer is due on or before November 30, 2012. The Respondent requests a further extension of this filing deadline to **Monday, December 31, 2012**.

AS GROUNDS THEREFORE, the respondent states that the parties have made substantial progress toward resolution of the matter through settlement and additional time is required to reach agreement and finalize the details. Counsel for EPA has indicated that she will not oppose this request for further enlargement of time for the Respondent to answer the Complaint.

Respectfully submitted,

JJP Lillis Enterprises, Inc. (d/b/a Cape Cod Ice)
By its attorney,



Barry P. Fogel, Esq.
Keegan Werlin LLP
265 Franklin Street
Boston, MA 02110
(617) 951-1400
bfogel@keeganwerlin.com

I hereby certify that a true copy of the above document was served upon the attorney of record for each party by first class mail on 11/27/12



Dated: November 27, 2012