

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I**

In the Matter of)
)
Pike International, LLC;)
173-175 Park LLC;)
1533 Chapel LLC;)
Quinnipiac Gardens, Inc.;)
H & H Residential LLC;)
FOR LIFE LLC)
287 Norton, LLC;)
325 Fountain, LLC;)
477 Prospect, LLC;)
80 Sherman, LLC.)
)
19 Howe Street, Carriage House)
New Haven, Connecticut 06511)
)
Respondents.)
)
Proceeding under Section 16(a) of)
the Toxic Substances Control Act,)
42 U.S.C. § 2615(a).)

Docket No. TSCA-01-2016-0034

RECEIVED
AUG 10 2016
EPA ORC
Office of Regional Hearing Clerk

**SECOND MOTION ON CONSENT TO
FURTHER EXTEND TIME TO RESPOND TO COMPLAINT**

In accordance with 40 C.F.R. § 22.7, Respondents request a further extension of time to respond to the Administrative Complaint and Notice of Opportunity for Hearing in this matter (“Complaint”). The current due date for Respondents’ response to the Complaint is **August 8, 2016**. The Motion seeks an eleven (11) day extension to **August 19, 2016**. Counsel for Respondents has consulted with the United States Environmental Protection Agency’s (“EPA”) Enforcement Counsel as to the filing of this Motion and she consents to the extension.

As grounds for this Motion, Respondents state the following:

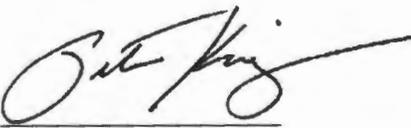
1. The parties held an informal conference on June 1, 2016;
2. In light of the conference, Respondents are compiling additional information concerning the allegations;
3. The parties continue to confer to determine whether the matter might be settled without further action by either party;
4. No party will be prejudiced by the requested extension; and
5. By the filing of this Motion, Respondents are not waiving any rights or defenses with respect to the Complaint.

WHEREFORE, Respondents do respectfully request that the Regional Judicial Officer enter an order extending the time by which Respondents must respond to the Complaint up to and including August 19, 2016.

Respectfully submitted,

Pike International, LLC;
173-175 Park LLC;
1533 Chapel LLC;
Quinnipiac Gardens, Inc.;
H & H Residential LLC;
FOR LIFE LLC
287 Norton, LLC;
325 Fountain, LLC;
477 Prospect, LLC;
80 Sherman, LLC.
19 Howe Street, Carriage House
New Haven, Connecticut 06511

By Their Attorneys,
Robinson & Cole LLP

By: 

Peter R. Knight
Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06103
Tel: (860) 275-8387
pknight@rc.com

Date: August 4, 2016

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion on Consent to Extend Time to Respond to the Complaint was sent via e-mail and standard mail to the Regional Hearing Clerk's office at the following address:

Wanda Santiago
Regional Hearing Clerk
U.S. Environmental Protection Agency, Region I
5 Post Office Square, Suite 100
Mailcode ORA 18-1
Boston, MA 02109-3912

And that a copy was sent to Complainant by e-mail and standard mail at the following address:

Andrea Simpson, Esq.
EPA Region I
5 Post Office Square, Suite 100
Boston, MA 02109-3912

Date: August 4, 2016



Peter R. Knight