

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1

In the Matter of:

Howard Gross
466 Central Avenue, Suite 9
Dover, New Hampshire 03820

Respondent

Docket No. TSCA-01-2019-0050

Proceeding under Section 16(a) of
the Toxic Substances Control Act,
15 U.S.C. § 2615(a)

**SECOND ASSENTED TO MOTION FOR EXTENSION OF TIME
TO ANSWER ADMINISTRATIVE COMPLAINT**

NOW COMES Howard Gross, Respondent in the above-captioned matter, by and through his attorneys, and respectfully moves for a 30 day extension of time to answer the Administrative Complaint in this matter on the following grounds:

1. Mr. Gross was served with the Administrative Complaint by certified mail on or about October 2, 2019, requiring an answer by November 1, 2019.
 2. Mr. Gross and his then-counsel for this matter met with Tim Conway and Jordan Alves to discuss the Administrative Complaint and related issues on October 31, 2019.
 3. On November 12, 2019, the parties agreed to a 90 day extension of time until January 30, 2020 for Mr. Gross to answer the Administrative Complaint to allow undersigned counsel to get up to speed on the issues regarding this case and to give the parties an opportunity to seek to negotiate a reasonable resolution of this matter without the need for administrative litigation.
- The motion was granted by Order dated November 20, 2019.

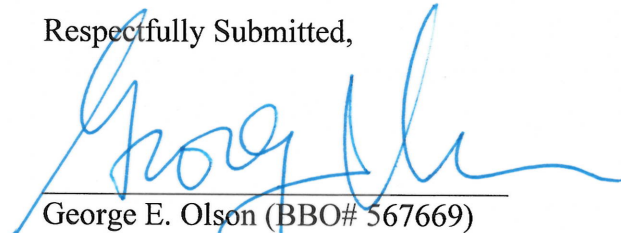
4. The parties have been negotiating in good faith in an effort to resolve this matter, but because of their respective workloads and the intervening Holidays, need additional time to determine if a settlement can be reached.

5. After conferring with Attorney Conway today, we agreed that a thirty day extension of time was appropriate to allow the parties to further advance our negotiations.

WHEREFORE, Howard Gross respectfully requests a 30 day extension of time to answer the Administrative Complaint, until February 29, 2020.

Dated: January 13, 2020

Respectfully Submitted,



George E. Olson (BBO# 567669)
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In the Matter of Howard Gross, Respondent

Docket No. TSCA-01-2019-0050

CERTIFICATE OF SERVICE

I hereby certify that, on January 13, 2020, the foregoing Notice of Appearance was delivered via email to the following addressees:

Wanda Santiago
Regional Hearing Clerk
US EPA Region 1
5 Post Office Square, Suite 100 (Mail Code 04-6)
Boston, Massachusetts 02109-3912
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HOWARD GROSS,
By his attorney,



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