

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 2

In the matter of:
TAPI Puerto Rico, Inc.
Respondent

Docket No. CAA-02-2011-1204

U.S. ENVIRONMENTAL
PROTECTION AGENCY-REG.11
2012 MAR -6 P 12:10
REGIONAL HEARING
CLERK

MOTION REQUESTING STAY IN PROCEEDINGS

TO THE HONORABLE PRESIDING OFFICER:

COMES NOW, Complainant, the Environmental Protection Agency ("EPA") and Respondent, TAPI Puerto Rico, Inc. ("TAPI"), through the undersigned attorneys, and very respectfully inform, state and pray as follows:

1. Since the filing of the Complaint, EPA and TAPI ("the Parties") engaged in discussions and information exchanges aimed at determining whether a possible settlement of the above captioned case was viable.
2. In February 2012, the Parties continued discussions, this time, focused in the settlement amount and other key factors necessary to determine if the Parties would reach a possible agreement in principle of the above captioned case.
3. On March 2, 2012, EPA notified TAPI of the latest terms in connection with the agreement in principle, which TAPI has just accepted.
4. Having agreed in principle to the settlement of the above captioned case, the Parties will now focus on the preparation of a mutually acceptable consent agreement and final

order ("CA/FO") relative to the case. The Parties understand that the CA/FO may be filed for the Honorable Presiding Officer's consideration in the next month.

5. The Parties agree that a stay in the proceedings during this time would allow the Parties dedicate all efforts and resources on the prompt finalization of the CA/FO.

6. The Parties further understand that there is no undue delay, bad faith or dilatory motive that can affect the Parties' rights under law, and there is no prejudice or additional burden as a result of the stay in the proceedings herein requested.

7. In view of the foregoing, the Parties jointly request the Honorable Presiding Officer to stay the proceedings until April 5, 2012 to allow the Parties to file the CA/FO.

WHEREFORE, The Parties respectfully request this Honorable Presiding Officer to take notice of the aforementioned and, consequently, to stay the proceedings until April 5, 2012.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 5th day of March, 2012.

**UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY**

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