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October 24, 2018

VIA FEDEX AND E-MAIL

Wanda A. Santiago Regional Hearing Clerk U.S. EPA, Region 1 5 Post Office Square - Suite 100 Mail Code: ORC04-6 Boston, MA 02109-3912 Santiago.wanda@epa.gov

> In the Matter of: Campos Construction RE: Docket No. TSCA-01-2018-0058

Dear Ms. Santiago:

Enclosed for filing in the above-referenced matter is one original and one copy of the Consented To Motion for Extension of Time to File Responsive Pleading and Certificate of Service.

Very truly yours,

Elizabeth F. Quinby

EFQ:kms Enclosures

Kathleen E. Woodward, U.S. EPA (via email) cc: Jeffrey Talbert (via email) Neto Campos (via email)

U.S. ENVIRONMENTAL PROTECTION AGENCY REGION 1

U.S. ENVIRONMENTAL PROTECTION)
AGENCY REGION 1,)
Plaintiff,)))
v.) Docket No. TSCA-01-2018-0058
CAMPOS CONSTRUCTION)))
Defendant.)))
	_)

CONSENTED TO MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING

Pursuant to 40 CFR § 22.7, Defendant Campos Construction respectfully moves the Presiding Officer for a 60-day extension of time in which to file a responsive pleading to Plaintiff's Complaint, from the current deadline of October 29, 2018 to December 28, 2018.

The extension is requested to allow counsel for Defendant to understand all of the allegations and engage in substantive settlement discussions with EPA. Undersigned counsel have conferred with counsel for Plaintiff, who consents to this request for a 60-day extension to file a responsive pleading. Defendant has not previously requested an extension of time in this matter.

Wherefore, Defendant respectfully requests that the Presiding Officer extend the deadline for responsive pleadings on behalf of Defendant to December 28, 2018.

Dated: October 24, 2018

Respectfully submitted,

Jeffrey D. Talbert, Esq., Bar No. 4358 Elizabeth F. Quinby, Esq., Bar No. 6168 Attorneys for Campos Construction

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CERTIFICATE OF SERVICE

I, Elizabeth F. Quinby, attorney for Defendant Campos Construction, hereby certify that on the above date, I sent a copy of the foregoing by First Class U.S. Mail to:

Kathleen E. Woodward Senior Enforcement Counsel U.S. EPA, Region 1 5 Post Office Square – Suite 100 Mail Code: OES04-2

Boston, Massachusetts 02109-3912

Elizabeth F. Quinby

Attorney for Campos Construction

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