

FILED

2015 MAR 11 PM 1:17

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 6

In the Matter of

Docket No. CWA-06-2015-1717

Evangeline Enterprises, L.L.C.

Proceeding to Assess a Class II
Civil Penalty under Section 309(g)
Of the Clean Water Act

Respondent

ADMINISTRATIVE COMPLAINT

Facility Number: LAU004016

MOTION FOR EXTENSION OF TIME

Comes now **Evangeline Enterprises, L.L.C.** by and through its counsel, **Jade Roland Andrus- Andrus & Andrus LLC**, pursuant to Rule 22.7(b), *et al* of the Consolidated Rules of Practice (40 C.F.R. ' 22.7(b)) and respectfully requests a **NINETY (90) day** extension of time to file its Answer to Administrative Complaint and as good cause therefore states as follows:

Evangeline Enterprises, LLC is actively communicating and negotiating with the U.S. Environmental Protection Agency to resolve this subject matter of the Complaint and, as such, respectfully requests the aforementioned extension of time to answer.

Prior to filing this Motion, the undersigned counsel contacted opposing counsel, **Ellen Chang Vaughn**, as to the extension requested herein and said opponent indicated that she does NOT oppose the Motion.

X

Dated: March 10, 2015

JADE ROLAND ANDRUS

Andrus & Andrus, LLC

La. Bar Roll # 26,173

Attorney for Evangeline Enterprises, LLC

219 West Brentwood Boulevard

Lafayette, La. 70506

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CERTIFICATE OF SERVICE

I certify that the foregoing **MOTION FOR EXTENSION OF TIME** dated March 10, 2015, was sent this day in the following manner to the addressees listed below:

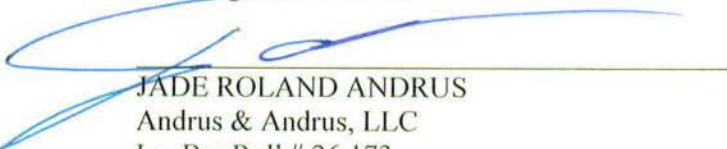
Original by Regular Mail to:

Regional Hearing Clerk
U.S. EPA - Region 6
1445 Ross Avenue- Suite 1200
Dallas, Texas 75202-2733

Copy by Regular Mail and facsimile to:

Ellen Chang Vaughn
Attorney for U.S. Environmental Protection Agency
1445 Ross Avenue- Suite 1200
Dallas, Texas 75202-2733

Presiding Judge: Unknown at this time
U.S. Environmental Protection Agency
Office of Administrative Law Judges
1200 Pennsylvania Ave., N.W.
Mail Code 1900L
Washington, DC 20005



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Dated: March 10, 2015