

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5

In the Matter of:

CUTTING EDGE ENTERPRISES, INC.  
Forest Lake, Minnesota,

Respondent.

Proceeding to Assess a Civil Penalty  
Pursuant to the Clean Air Act  
Section 205(c)(1)

Docket No CAA-05-2024-0004

**MOTION FOR EXTENSION  
OF TIME TO ANSWER**

TO: The U.S. EPA Region 5 Regional Judicial Officer, Ann Coyle, [coyle.ann@epa.gov](mailto:coyle.ann@epa.gov); and Authorized Agent, Louise Gross, Associate Regional Counsel, U.S. EPA, Region 5, [gross.louise@epa.gov](mailto:gross.louise@epa.gov); Andrew Futerman, Attorney Advisor; U.S. EPA Region5, [futerman.andrew@epa.gov](mailto:futerman.andrew@epa.gov); and Michael D. Harris Division Director, Enforcement and Compliance Assurance Division, U.S. Environmental Protection Agency, Region 5, [harris.michael@epa.gov](mailto:harris.michael@epa.gov).

The Respondent, Cutting Edge Enterprises, Inc., by and through its undersigned attorney, respectfully moves the Court for an Order enlarging the time to file its Answer to the Complaint and Notice of Opportunity for Hearing pursuant to 40 C.F.R. § 22.7(b), due to Respondent replacement counsel unavailability until today to meet and complete retainer because of holiday. As grounds, Cutting Edge Enterprises, Inc., offers the following:

The current deadline for Cutting Edge Enterprises, Inc., to file its response is July 8, 2024. Respondent's current counsel obtained an extension until today, July 8<sup>th</sup>, 2024 as Cutting Edge Enterprises, Inc. was seeking new, more competent counsel to proceed. Their first choice did not work out and they were able to identify new counsel, but they were unable to meet until today with the holiday. Therefore, they are seeking an additional two weeks, until Monday, July 22, 2025, to file Answer.

Prior to submitting this request, Respondent's counsel sent an email to Louise Gross and Andrew Futerman seeking their position. They are unopposed to the request as indicated in their email dated today at 2:17PM, CST .

Based on the foregoing information, Cutting Edge Enterprises, Inc., through its undersigned attorney, respectfully requests enlarging the time to file its response to Complaint and Notice of Opportunity for Hearing to July 25, 2024.

Respectfully submitted,

**MESENBOURG & SARRATORI  
LAW OFFICES, P.A.**



Dated: July 8, 2024

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