REGION VII O7 SEP -7 AM | 1: | 4 ENVIRONMENTAL PROTECTION AGENCY-REGION VII REGIONAL HEARING CLERK Larry Neff Management and Development,) Inc.,) Respondent)

UNITED STATES ENVIRONMENTAL PROTECTION AGENO

MOTION FOR EXTENSION OF TIME TO ANSWER

Respondent Larry Neff Management and Development, Inc. requests an extension of time of thirty days, until October 10, 2007, to answer the Complaint, Notice of Proposed Penalty and Notice of Opportunity for Hearing.

In support of this motion, Respondent states that the undersigned counsel was engaged to represent Respondent on September 4, 2007, and has not yet had a full opportunity to review the file and consult with Respondent in order to prepare an answer to defend against the charges in the Complaint. One extension was obtained previously, until September 10, 2007, but Respondent was not at that time represented by the undersigned. Jonathan Meyer, Assistant Regional Counsel for the United States Environmental Protection Agency, has been consulted and does not object to this extension of time. This request is not made for the purpose of undue delay, but in order to allow Respondent's counsel to fully review the record and consult with Respondent to protect Respondent's rights and answer fully.

10, 2007, in which to answer the Complaint, Notice of Proposed Penalty and Notice of Opportunity for Hearing.

Respectfully submitted,

THE WOODY LAW FIRM PC

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ATTORNEY FOR RESPONDENT

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served by United States mail, postage prepaid, this 6th day of September, 2007, on:

Jonathan Meyer

Assistant Regional Counsel

Region VII

U. S. Environmental Protection Agency

901 N. 5th Street

Kansas City, KS 66101

Attorney for Respondent



September 6, 2007

Ms. Kathy Robinson Regional Hearing Clerk U. S. Environmental Protection Agency, Region 7 901 N. 5th Street Kansas City, KS 66101

RE: Larry Neff Management and Development, Inc.

No. TSCA-07-2007-0024

Dear Ms. Robinson:

Enclosed are the originals of Respondent's Entry of Appearance and Motion for Extension of Time to Answer, previously faxed to your office on September 6, 2007. I would appreciate it if you would see that these are filed in the above-captioned case.

If you have any questions, please do not hesitate to contact me.

Thank you for your assistance in this matter.

Cc: Jonathan Meyer

Assistant Regional Counsel