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8 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
9 REGION X

10 IN THE MATTER OF: )  
11 )  
12 ) MOTION AND ORDER TO EXTEND  
13 ) TIME TO ANSWER COMPLAINT  
14 ARGENT CHEMICAL LABORATORIES, )  
15 INC., ELIOT LIEBERMAN, and ) Docket No FIFRA-10-2004-0073  
16 BEATRIZ SHANAHAN )  
17 )  
18 )  
19 )  
20 )  
21 )  
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23 )  
24 )  
25 )  
26 )  
RESPONDENTS. )  
\_\_\_\_\_ )

17 On behalf of all counsel representing Argent Chemical Laboratories, Inc., Eliot  
18 Lieberman and Beatriz Shanahan, it is hereby requested that the time to file an  
19 Answer in this matter be continued from on or about June 5, 2004 to on or before  
20 July 30, 2004.

22 This Motion is made because of the complexity of the Complaint, the number  
23 of alleged violations, and the fact that one of the parties has been abroad for several  
24 weeks.

25 The contents of this motion has been shown to and discussed with EPA

26 MOTION TO EXTEND TIME TO  
ANSWER COMPLAINT- 1

THE FINEGOLD LAW FIRM  
1809 - 7<sup>th</sup> AVENUE  
SUITE 1301  
SEATTLE, WASHINGTON 98101-1313  
(206) 682-1116

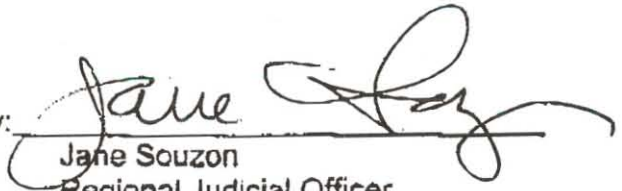
1 Assistant Regional Counsel, Juliane Matthews and she has authorized the  
2 undersigned to indicate that she has no objection to the requested extension of time  
3 to respond to the Complaint.

4 Respectfully submitted this 3<sup>rd</sup> day of June 2004.

7 THE FINEGOLD LAW FIRM

8  
9   
10 LAURENCE B. FINEGOLD  
11 Attorney For Eliot Lieberman

12  
13 DATED: June 3, 2004

14 By:   
15 Jane Souzon  
16 Regional Judicial Officer

26 MOTION TO EXTEND TIME TO  
ANSWER COMPLAINT- 2

THE FINEGOLD LAW FIRM  
1809 - 7<sup>th</sup> AVENUE  
SUITE 1301  
SEATTLE, WASHINGTON 98101-1313  
(206) 682-1115

1 Assistant Regional Counsel, Juliane Matthews and she has authorized the  
2 undersigned to indicate that she has no objection to the requested extension of time  
3 to respond to the Complaint.

4 Respectfully submitted this 3<sup>rd</sup> day of June 2004.  
5

6  
7 THE FINEGOLD LAW FIRM

8  
9   
10 LAURENCE B. FINEGOLD  
11 Attorney For Eliot Lieberman

12  
13 DATED: \_\_\_\_\_

14 By: \_\_\_\_\_  
15 Jane Souzon  
16 Regional Judicial Officer

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26 MOTION TO EXTEND TIME TO  
ANSWER COMPLAINT- 2

THE FINEGOLD LAW FIRM  
1809 - 7<sup>th</sup> AVENUE  
SUITE 1301  
SEATTLE, WASHINGTON 98101-1313  
(206) 682-1116

CERTIFICATE OF SERVICE

I hereby certify that the original and one true and correct copy of the foregoing Motion and Order To Extend Time To Answer Complaint, and Proposed Order Extending Time To Answer Complaint, Docket No. FIFRA-10-2004-0073 was hand-delivered to the Regional Hearing Clerk, U.S. Environmental Protection Agency, Region 10, 1200 Sixth Avenue, Seattle, Washington 98101, on this 4<sup>th</sup> day of June, 2004 to:

Carol Kennedy, Regional Hearing Clerk  
U.S. Environmental Protection Agency, Region 10  
1200 Sixth Avenue, ORC-158  
Seattle, WA 98101

Juliane Matthews  
Assistant Regional Counsel  
U.S. Environmental Protection Agency  
1200 Sixth Avenue, ORC-158  
Seattle, WA 98101

**Certified Mail, Return Receipt Requested to:**

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1809 - 7<sup>th</sup> Avenue  
Suite 1301  
Seattle, WA 98010-1313

Beatriz Shanahan  
Argent Chemical Laboratories  
8702 152<sup>nd</sup> Avenue NE  
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Eliot Lieberman  
Argent Chemical Laboratories  
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Redmond, WA 98502

John S. York, Jr.  
Attorney at Law  
215 NE 40<sup>th</sup> Street  
Suite C-3  
Seattle, WA 98501-6567

DATED this 4<sup>th</sup> day of June 2004.



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U.S. Environmental Protection Agency  
Region 10