

BEFORE THE
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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In the Matter of :
:
CHILKOOT LUMBER COMPANY, INC. :
AND : Docket No. TSCA-10-2010-0253
MR. L. EDWARD LAPEYRI, :
Haines, Alaska :
Respondents. :
:
:

UNOPPOSED MOTION TO STAY PROCEEDINGS FOR SIXTY DAYS

Come now the Respondents, by and through co-counsel and move that proceedings in the above captioned matter be stayed for sixty days.

On Saturday, 8 April 2011, Fred W. Triem, counsel for the respondents suffered a heart attack. As of this writing, Mr. Triem is recovering, but remains hospitalized in Anchorage, Alaska. Word came last evening that Mr. Triem may have to undergo further surgery. Consequently, the date of his discharge may be delayed ten days or so.

Co-counsel, was asked by Mr. Triem to assist him in a limited capacity in this case. Only after Mr. Triem suffered a heart attack did Nash become more active. Nash was not engaged by the respondents to represent them at the upcoming administrative hearing in this matter.

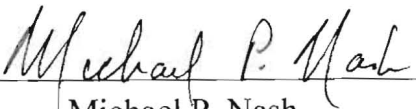
Given Mr. Triem's medical condition, Respondents move that proceedings be stayed for sixty days to allow time either for Mr. Triem to recover or to allow Respondents time to

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find substitute counsel. Alexander Fidis, counsel for the Agency, has indicated that, under the circumstances, the Agency does not oppose this request for a stay.

If this motion is granted, the Respondents will continue to pursue settlement with the Agency during the stay.

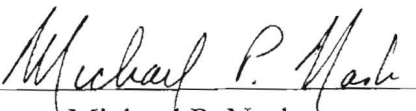
Respectfully submitted this 28th day of April 2011 at Friday Harbor, Washington.



Michael P. Nash
Co-counsel *pro tem*

CERTIFICATE OF SERVICE

I certify that on 28 April 2011, I sent the original and one copy of the foregoing Motion to the Regional Hearing Clerk at U.S. Environmental Protection Agency, 1200 Sixth Avenue, Suite 900, Mail Stop ORC-158, Seattle, Washington 98101, and that I sent copies to Hon. Barbara A. Gunning, Administrative Law Judge, EPA Office of Administrative Law Judges, 1200 Pennsylvania Avenue, NW, Mail Code 1900L, Washington, DC 20460-2001 and Alexander Fidis, Esq. Agency Counsel, U.S. Environmental Protection Agency, 1200 Sixth Avenue, Suite 900, Mail Stop ORC-158, Seattle, Washington 98101 by placing a copy in the postal mail to them.



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