

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1

BEFORE THE ADMINISTRATOR

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_____))
IN THE MATTER OF:))
))
Harbour Industries, LLC))
))
))
Respondent.))
_____)

Docket No. CAA-01-2011-0016

AGREED MOTION FOR EXTENSION OF TIME

Comes now Respondent Harbour Industries, LLC, by and through its counsel, pursuant to Rule 22.7(b) of the Consolidated Rules of Practice (40 C.F.R. § 22.7(b)) and respectfully requests a 45 day extension of time to file its ANSWER and as good cause therefore states as follows:

On January 21, 2011, United States Environmental Protection Agency ("EPA") served the Complaint on Harbour Industries, LLC. An Answer in response to the Complaint is due on February 22, 2011. On February 10, 2011, the parties held an informal settlement conference. The parties have continued to engage in settlement discussions since the informal settlement conference and believe that they have identified the terms of a settlement in principal.

Prior to filing this Motion, the undersigned contacted the opposing party as to the extension requested herein and said opponent indicated that it does not oppose the Motion.

HARBOUR INDUSTRIES, LLC:

By: Susan M. Franzetti
Susan M. Franzetti

Dated: February 17, 2011

Susan M. Franzetti
Nijman Franzetti LLP
10 S. LaSalle St., Suite 3600
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(312) 251-5590

CERTIFICATE OF SERVICE

I certify that the foregoing APPEARANCE and AGREED MOTION FOR EXTENSION OF TIME, dated February 17, 2011, was sent on this day in the following manner to the addresses listed below:

Original by Federal Express Overnight Delivery: Regional Hearing Clerk
U.S. EPA, Region 1
5 Post Office Square
Suite 100 (Mail Code ORA18-1)
Boston, Massachusetts 02109-3912

Original by Federal Express Overnight Delivery: Ms. Jill T. Metcalf
Acting Regional Judicial Officer
U.S. EPA, Region 1
5 Post Office Square
Suite 100 (Mail Code ORA19-1)
Boston, Massachusetts 02109-3912

Copy by Federal Express Overnight Delivery: Mr. Thomas T. Olivier
Senior Environmental Counsel
U.S. EPA, Region 1
5 Post Office Square
Suite 100 (Mail Code OES04-3)
Boston, Massachusetts 02109-3912

By: 
Susan M. Franzetti
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Dated: February 17, 2011