

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

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| _____ |) | |
| In the Matter of: |) | |
| |) | |
| Brady Sullivan Millworks II, LLC and |) | Docket No. TSCA-01-2016-0054 |
| Brady Sullivan Millworks IV, LLC |) | |
| 670 N. Commercial Street, Suite 303 |) | |
| Manchester, New Hampshire |) | |
| |) | |
| Respondents |) | ASSENTED TO |
| |) | MOTION TO FURTHER |
| |) | EXTEND ANSWER DATE |
| Proceeding under Section 16(a) of |) | FOR 30 DAYS |
| the Toxic Substances Control Act, |) | |
| 42 U.S.C. § 2615(a). |) | |
| |) | |
| _____ |) | |

NOW COME, Brady Sullivan Millworks II, LLC and Brady Sullivan Millworks IV, LLC, (“Respondents”) by and through their attorney, Marc A. Pinard, Esquire, and respectfully request that this Honorable Court postpone for an additional 45 days the date upon which Respondents’ Answer is due for filing in this matter, and in support thereof state as follows:

1. The parties are engaged in an ongoing negotiation process relative to a potential settlement of this matter.
2. The parties settlement discussions to date have been fruitful and the parties are confident that a settlement is likely to be reached.
3. Accordingly the Respondents seek a further 45 day extension of the Answer due date from October 1, 2016 to November 14, 2016.


4. Respondents' counsel has sought and obtained assent to this Motion from EPA counsel, Attorney Andrea Simpson.

WHEREFORE, Respondents therefore respectfully request:

- A. A postponement of the Answer due date from October 1, 2016 to November 14, 2016; and
- B. Such other and further relief as justice requires.

Dated: September 26, 2016


Respectfully submitted,
RESPONDENTS:
Brady Sullivan Millworks II, LLC and
Brady Sullivan Millworks IV, LLC
By:



Marc A. Pinard, General Counsel
BBO # 551715; NH Bar # 4117
Brady Sullivan Properties
670 N. Commercial Street
Manchester, NH 03101
(603) 622-6223

CERTIFICATE OF SERVICE

I, Marc A. Pinard, Esquire, certify that on this date I provided a copy of the foregoing Motion by forwarding the same by electronic mail to EPA Counsel, Attorney Andrea Simpson to simpson.andrea@epa.gov.



Marc A. Pinard, BBO # 551715; NH Bar # 4117