

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

BEFORE THE ADMINISTRATOR

IN THE MATTER OF )

Hanson's Window and Construction, Inc. )  
Madison Heights, Michigan 48071 )

Respondent, )  
\_\_\_\_\_ )

Docket No. TSCA-05-2010-0013

Docket No. TSCA-05-2011-0006

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JOINT MOTION FOR EXTENSION OF TIME

REGIONAL HEARING CLERK  
U.S. ENVIRONMENTAL  
PROTECTION AGENCY

Complainant, the United States Environmental Protection Agency, Region 5, and Respondent Hanson's Window and Construction, Inc., by and through its counsel, pursuant to Rule 22.7(b) of the Consolidated Rules of Practice (40 C.F.R. § 22.7(b)) respectfully request a 15-day extension of time for Respondent to file its Prehearing Exchange and as good cause state as follows:

Respondent previously advised the Presiding Officer that it and Complainant had agreed in principle to the terms of a consent decree to resolve both Docket Nos. TSCA-05-2010-0013 and TSCA-05-2011-0006 and that Respondent and Complainant, without delay, intended to codify this agreement into a written consent decree to be filed with the Presiding Officer upon completion.

Both Complainant and Respondent have acted accordingly, and, working with the State of Michigan, the third party to the proposed consent decree, have agreed to the terms of a consent decree that each party is recommending for signature.

Both Complainant and Respondent agree that the granting of this motion will allow Respondent to avoid the unnecessary cost and burden of compiling its Prehearing

Exchange and allow Complainant to avoid the unnecessary cost and burden of compiling its Rebuttal Prehearing Exchange, thus allowing both parties to direct their complete attention to finalizing the consent decree.

Finally, Complainant and Respondent appreciate the timelines set forth in prehearing orders, and the desire to not continually extend same. Accordingly, neither Complainant nor Respondent would make this motion if either believed that final settlement will not be had imminently.

Respectfully submitted for

Hanson's Window and Construction, Inc.

By: 

Johanson Berenson LLP  
D.S. Berenson, Esq.  
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Respectfully submitted for

U.S. Environmental Protection Agency

By: 

Mary T. McAuliffe  
Associate Regional Counsel  
United States Environmental Protection Agency  
Region 5 (C-14J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

**CERTIFICATE OF SERVICE**

I hereby certify that on July 14, 2011, the original and a true copy of the foregoing Joint Motion for Extension of Time was filed with:

Regional Hearing Clerk (E-19J)  
United States Environmental Protection Agency – Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604

a true copy of the foregoing was hand delivered via courier to:

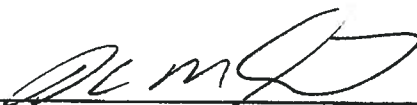
Chief Judge Susan L. Biro  
Office of Administrative Law Judges  
U.S. Environmental Protection Agency  
Ariel Rios Building, Mail Code 1900L  
1200 Pennsylvania Avenue, N.W.  
Washington D.C. 20460-2001

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Associate Regional Counsel  
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