



discuss possible settlement of the complaint against the Town. The Town would like to concentrate its efforts and legal budget on these efforts rather than on an administrative proceeding that ultimately may prove unnecessary. The Town's factual investigations remain ongoing, and the requested extension of time will allow more complete development of the material facts at issue. The Town further states that no prejudice will result from the granting of this extension at this early stage where both EPA and the Town will benefit from further development of the facts in this matter. EPA, through its senior enforcement counsel, has assented to this Motion.

WHEREFORE, the Town asks the Presiding Officer to issue an order granting this assented to Motion and extending the time period the Town has to answer the Administrative Complaint in this matter to September 28, 2009.

THE TOWN OF WINTHROP,  
By its attorneys,



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September 10, 2009

CERTIFICATE OF SERVICE

I hereby certify that I caused a true copy of the foregoing document to be served by mail upon counsel of record for each party and on the Regional Judicial Officer on September 10, 2009.



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