

PETER R. KNIGHT

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Via E-Mail and First Class Mail

May 20, 2016

Wanda Santiago
Regional Hearing Clerk
U.S. Environmental Protection Agency, Region I
5 Post Office Square, Suite 100
Mailcode ORA 18-1
Boston, MA 02109-3912



Re: **In the Matter of Pike International, et al., Docket No. TSCA-01-2016-0034**

Dear Ms. Santiago:

Enclosed please find a Motion on Consent to Extend Time to Respond to the Complaint with regard to the above-captioned action. The current response date is **May 27, 2016**. The Motion seeks an extension to **June 22, 2016**.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter R. Knight".

Peter R. Knight

PRK/see

Enclosures

Copy to: Andrea Simpson, Esq. (EPA)

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I**

In the Matter of)
)
Pike International, LLC;)
173-175 Park LLC;)
1533 Chapel LLC;)
Quinnipiac Gardens, Inc.;)
H & H Residential LLC;)
FOR LIFE LLC)
287 Norton, LLC;)
325 Fountain, LLC;)
477 Prospect, LLC;)
80 Sherman, LLC.)
)
19 Howe Street, Carriage House)
New Haven, Connecticut 06511)
)
Respondents.)
)
Proceeding under Section 16(a) of)
the Toxic Substances Control Act,)
42 U.S.C. § 2615(a).)

Docket No. TSCA-01-2016-0034

RECEIVED

MAY 24 2016

EPA ORC ^{WJ}
Office of Regional Hearing Clerk

MOTION ON CONSENT TO EXTEND TIME TO RESPOND TO COMPLAINT

In accordance with 40 C.F.R. § 22.7, Respondents request an extension of time to respond to the Administrative Complaint and Notice of Opportunity for Hearing in this matter (“Complaint”). The current due date for Respondents’ response to the Complaint is **May 27, 2016**. The Motion seeks an extension to **June 22, 2016**. Counsel for Respondents has consulted with the United States Environmental Protection Agency’s (“EPA”) Enforcement Counsel as to the filing of this Motion and she does not oppose the extension.

As grounds for this Motion, Respondents state the following:

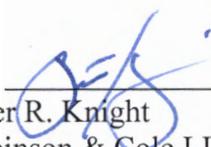
1. The undersigned has recently been engaged by Respondents and he therefore requires a reasonable period of time within which to familiarize himself with the allegations;
2. Given the schedules of Counsel and the need to become familiar with the pending matter, the parties will not meet for an informal conference until after the current May 27, 2016 response date;
3. Respondents and the EPA's Enforcement Counsel agree that the proposed extension of time to respond to the Complaint should allow the parties to determine whether this matter might be settled without further action by either party;
4. No party will be prejudiced by the requested extension; and
5. By the filing of this Motion, Respondents are not waiving any rights or defenses with respect to the Complaint.

WHEREFORE, Respondents do respectfully request that the Regional Judicial Officer enter an order extending the time by which Respondents must respond to the Complaint up to and including June 22, 2016.

Respectfully submitted,

Pike International, LLC;
173-175 Park LLC;
1533 Chapel LLC;
Quinnipiac Gardens, Inc.;
H & H Residential LLC;
FOR LIFE LLC
287 Norton, LLC;
325 Fountain, LLC;
477 Prospect, LLC;
80 Sherman, LLC.
19 Howe Street, Carriage House
New Haven, Connecticut 06511

By Their Attorneys,
Robinson & Cole LLP

By: 
Peter R. Knight
Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06103
Tel: (860) 275-8387
pknight@rc.com

Date: May 20, 2016

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion on Consent to Extend Time to Respond to the Complaint was sent via e-mail and standard mail to the Regional Hearing Clerk's office at the following address:

Wanda Santiago
Regional Hearing Clerk
U.S. Environmental Protection Agency, Region I
5 Post Office Square, Suite 100
Mailcode ORA 18-1
Boston, MA 02109-3912

And that a copy was sent to Complainant by e-mail and standard mail at the following address:

Andrea Simpson, Esq.
EPA Region I
5 Post Office Square, Suite 100
Boston, MA 02109-3912

Date: May 20, 2016



Peter R. Knight