

Rhiannon A. Campbell
rcampbell@haslaw.com

28 State Street
Boston, MA 02109-1775
TEL: 617.345.9000
FAX: 617.345.9020
www.haslaw.com

October 16, 2012

VIA HAND DELIVERY

Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 1
5 Post Office Square – Suite 100 (Mail Code ORA18-1)
Boston, MA 02109-3912



Re: **The Moore Company (Fulflex Division)**
Docket No. CAA-01-2012-0085

Dear Clerk:

Pursuant to 40 CFR § 22.5, I enclose the original and one copy of The Moore Company's (Fulflex Division) Motion for an Extension of Time to Respond to the Complaint.

Should you have any questions, please contact me.

Very truly yours,

A handwritten signature in blue ink that appears to read "Rhiannon A. Campbell".

Rhiannon A. Campbell

RAC
Enclosures

cc: Laura J. Beveridge (w/ enc.) (via Hand Delivery)

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1**



IN THE MATTER OF)

) Docket No. CAA-01-2012-0085
)

) The Moore Company (Fulflex Division))
) 32 Justin Holden Drive)
) Brattleboro, Vermont)
)
)
)
)

) Proceeding under Section)
) 113 of the Clean Air Act)
_____)

**MOTION FOR AN EXTENSION OF TIME
TO RESPOND TO THE COMPLAINT**

Respondent, The Moore Company (Fulflex Division) ("Fulflex") respectfully moves for the entry of an Order extending the time for Fulflex to answer or otherwise respond to the Complaint up to and including November 21, 2012. The Environmental Protection Agency ("EPA") has no objection to the requested extension.

In support of this Motion, Fulflex states as follows:

1. The EPA commenced this action on September 18, 2012
2. Fulflex accepted service of the Complaint on September 21, 2012.
3. The deadline for Fulflex to answer or otherwise respond to the Complaint currently is October 21, 2012.
4. This extension is requested so that the parties may attempt to negotiate a settlement of this matter before committing further resources to the litigation of this matter.
5. EPA has no objection to the requested extension of time, namely up to and including November 21, 2012, to answer or otherwise respond to the Complaint.

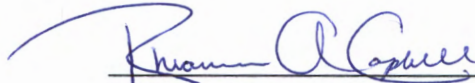
6. Fulflex submits that, given the nature of the relief being requested herein, no memorandum of law is required for this Motion.

WHEREFORE, Fulflex respectfully requests entrance of an Order:

- A. Granting this Motion and extending the deadline for Fulflex to answer or otherwise respond to the Complaint up to and including November 21, 2012; and
- B. Awarding such other relief as is just and proper.

The Moore Company (Fulflex Division),

By its attorneys,



Robin L. Main (BBO No. 556074)
Rhiannon A. Campbell (BBO No. 682193)
Hinckley, Allen & Snyder LLP
28 State Street
Boston, MA 02109
Telephone: (617) 345-9000
Facsimile: (617) 345-9020
rmain@haslaw.com

Dated: October 16, 2012

CERTIFICATE OF SERVICE

I, Rhiannon A. Campbell, Esq., hereby certify that on October 16, 2012, I served a copy of the foregoing document in the above-captioned matter via hand delivery to Laura J. Beveridge, Enforcement Counsel, U.S. Environmental Protection Agency, Region 1, 5 Post Office Square – Suite 100 (Mail Code OES04-3), Boston, Massachusetts 02109-3912.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1**

IN THE MATTER OF)

The Moore Company (Fulflex Division))
32 Justin Holden Drive)
Brattleboro, Vermont)

Proceeding under Section)
113 of the Clean Air Act)
_____)

Docket No. CAA-01-2012-0085

RECEIVED
OCT 17 2012
EPA ORC *WS*
Office of Regional Hearing Clerk

COPY

**MOTION FOR AN EXTENSION OF TIME
TO RESPOND TO THE COMPLAINT**

Respondent, The Moore Company (Fulflex Division) ("Fulflex") respectfully moves for the entry of an Order extending the time for Fulflex to answer or otherwise respond to the Complaint up to and including November 21, 2012. The Environmental Protection Agency ("EPA") has no objection to the requested extension.

In support of this Motion, Fulflex states as follows:

1. The EPA commenced this action on September 18, 2012
2. Fulflex accepted service of the Complaint on September 21, 2012.
3. The deadline for Fulflex to answer or otherwise respond to the Complaint currently is October 21, 2012.
4. This extension is requested so that the parties may attempt to negotiate a settlement of this matter before committing further resources to the litigation of this matter.
5. EPA has no objection to the requested extension of time, namely up to and including November 21, 2012, to answer or otherwise respond to the Complaint.

6. Fulflex submits that, given the nature of the relief being requested herein, no memorandum of law is required for this Motion.

WHEREFORE, Fulflex respectfully requests entrance of an Order:

- A. Granting this Motion and extending the deadline for Fulflex to answer or otherwise respond to the Complaint up to and including November 21, 2012; and
- B. Awarding such other relief as is just and proper.

The Moore Company (Fulflex Division),

By its attorneys,



Robin L. Main (BBO No. 556074)
Rhiannon A. Campbell (BBO No. 682193)
Hinckley, Allen & Snyder LLP
28 State Street
Boston, MA 02109
Telephone: (617) 345-9000
Facsimile: (617) 345-9020
rmain@haslaw.com

Dated: October 16, 2012

CERTIFICATE OF SERVICE

I, Rhiannon A. Campbell, Esq., hereby certify that on October 16, 2012, I served a copy of the foregoing document in the above-captioned matter via hand delivery to Laura J. Beveridge, Enforcement Counsel, U.S. Environmental Protection Agency, Region 1, 5 Post Office Square – Suite 100 (Mail Code OES04-3), Boston, Massachusetts 02109-3912.

