

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

In the Matter of:

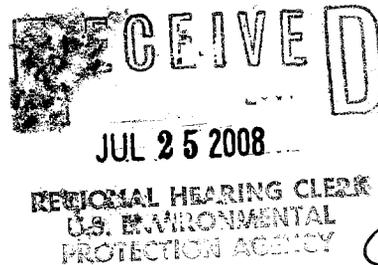
One Management, Inc.,
L & J Investment, Inc., and
One Management Investment Group,
Detroit, Michigan,

Respondents.

Docket No.: TSCA-05-2008-0012

RESPONDENTS' UNOPPOSED
MOTION FOR EXTENSION OF
TIME TO RESPOND TO THE
COMPLAINT

Michael H. Perry (P22890)
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Attorneys for Respondent
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NOW COME the Respondents One Management, Inc., L & J Investment, Inc., and One Management Investment Group, Detroit, Michigan, by and through their attorneys, Fraser Trebilcock Davis & Dunlap, P.C., and by way of an unopposed motion for an extension of time within which to respond to the Complaint in this matter, say as follows:

1. According to the first page of the 250 page Complaint in this matter, the Complaint was filed in the Office of the Regional Hearing Clerk on June 23, 2008. The Certificate of Service attached to the Complaint states that an original and one copy of the Complaint was sent by certified mail to the Respondents on that date.
2. Soon after June 23, 2008 the Respondents received copies of the Complaint and forwarded a copy thereof to the undersigned.
3. The response to the Complaint is due within 30 calendar days after its receipt. Although the undersigned presently lacks information regarding the specific date on which the Respondents received the Complaint, it is reasonably

estimated that the Respondents had received the Complaint on or about June 25, 2008. This means that the response to the Complaint is due on or about July 25, 2008.

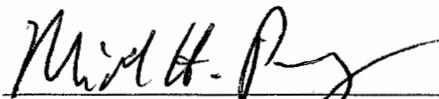
4. On Tuesday, July 22, 2008, the undersigned spoke with Ms. Mary McAuliffe, counsel for the Complainant in this matter and requested an extension of time within which to respond to the Complaint to August 15, 2008.
5. Ms. McAuliffe indicated that she would not oppose a motion for an extension of time to file the response on or before August 15, 2008.
6. The 250 page Complaint includes 861 separately numbered paragraphs and a number of pages thereafter regarding the proposed civil penalty for each of the 670 counts contained within the Complaint.
7. The undersigned is also counsel of record in a number of other non-US EPA related matters.
8. The undersigned has prepaid for a family vacation beginning on Friday, July 25, 2008 and will return his office on Tuesday, August 5, 2008.
9. The agreement of US EPA's counsel, Mary McAuliffe, particularly in light of the length and breadth of the Complaint, the undersigned's need to attend to other matters, and the undersigned's forthcoming prepaid vacation, are factors which justify the brief extension of time to August 15, 2008 to respond to the Complaint.

WHEREFORE, for the reasons stated above, the undersigned respectfully requests the entry of an Order granting the Respondents an extension to August 15, 2008 to respond to the Complaint.

Respectfully submitted,

FRASER TREBILCOCK DAVIS & DUNLAP, P.C.
Attorneys for Respondents

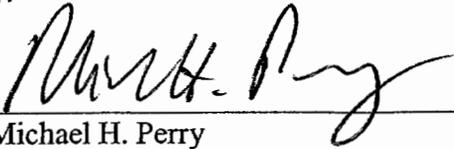
Dated: July 22, 2008

By: 

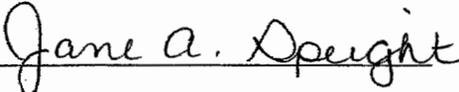
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FRASER
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DUNLAP,
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LAWYERS
LANSING,
MICHIGAN
48933

5. I have personal knowledge of the facts stated above and if called upon to testify could do so competently.


Michael H. Perry

Subscribed and sworn to before me
this 2nd day of July, 2008


Jane A. Speight

JANE A. SPEIGHT
NOTARY PUBLIC - STATE OF MICHIGAN
COUNTY OF CLINTON
My Commission Expires Aug. 22, 2014
Acting in the County of Ingham

