

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2**

In the Matter of:	*	Proceeding to Assess a Class II Civil
	*	
CARAM CONSTRUCTION, INC.	*	Proceeding pursuant to Section 309(g)
1316 Fernández Juncos Avenue	*	of the Clean Water Act, 33 U.S.C.
San Juan, Puerto Rico 00910	*	§1319(g)
	*	
Respondent	*	
	*	
LA ALBORADA RESIDENTIAL DEVELOPMENT	*	Docket No.: CWA-02-2009-3452
	*	
	*	
NPDES Permit No. PRR10BB83	*	

U.S. ENVIRONMENTAL
PROTECTION AGENCY
2009 NOV 13 PM 1:49
REGIONAL HEARING
CLERK

MOTION REQUESTING EXTENSION OF TERM

COME NOW the undersigned attorneys and respectfully states and prays:

1. The undersigned counsels respectfully request the Hearing Examiner an additional extension of 30 days to complete the process of Alternative Dispute Resolution (ADR).

2. This request is presented because the counsels were unable to complete the ADR process. The technical staff of the U.S. Environmental Protection Agency who was involved in the imposition of the penalty was outside the agency due to its annual leave.

3. Moreover, the lawyers are in the process of negotiating several elements of the violations set forth and will soon submit a stipulation or agreement on collecting penalties.

WHEREFORE, the undersigned counsels respectfully request the Hearing Examiner to take notice of the aforesaid and grant the requested 30 day terms.

Respectfully submitted, this 12 of November, 2009

I hereby certify that on this date I have caused the original of this Motion and a copy to be sent to the Regional Hearing Clerk, U.S. EPA Region 2, 290 Broadway, 16th Floor, New York, New York 10007-1866.

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