### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Region 2

In the Matter of:

Laser Products, Inc. 185 Km. 19 Antigua Central Juncos Juncos, Puerto Rico 00777-1723

Respondent

### Docket No. CAA-02-2011-1218

Administrative Complaint under Order Section 113 of the Clean Air Act, 42 U.S.C. § 7413

CLEREARING

# STATUS REPORT AND JOINT MOTION REQUESTING STAY IN THE PROCEEDINGS

COMES NOW Complainant, the U.S. Environmental Protection Agency ("EPA" or "Complainant") and Respondent, Laser Products, Inc. ("Laser" or "Respondent"), through the undersigned attorneys, and respectfully allege, pray and request as follows:

1. EPA and Laser (herein collectively referred to as "the Parties") have been participating in the Alternative Dispute Resolution (ADR) process offered by the Office of Administrative Law Judges. This process reached its end on March 30, 2012, as expressed by Hon. Judge Gunning, who served as a neutral in the proceedings.

2. Since the Parties have agreed in principle to the settlement of the case, and are now focused on furthering the development of a mutually acceptable consent agreement and final order ("CA/FO"), our neutral Judge recommended the immediate filing of a Status Report and the request of a stay in the proceedings of the case.

3. The parties request that all matters relating to this case be stayed for a period of sixty (60) days from the date of this Motion so the Parties may complete the CA/FO.

4. Specifically, the Parties request this Honorable Court to refrain from issuing a Pre-Hearing Order ("PHO") until after the sixty (60) days stay has elapsed.

5. The Parties make this request not for the purpose of undue delay but to promote justice and judicial economy.

6. In light of the above, and that there is no undue delay, bad faith or dilatory motive, the Parties request the Honorable Chief Administrative Law Judge to grant a stay in the proceedings.

Respectfully submitted today, April 2, 2012, in Guaynabo, Puerto Rico. Pedro Reyes-Bibiloni Carolina Jordán-García, Esq. US Environmental Protection Agency, Region 2 P.O. Box 363507

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### **CERTIFICATE OF SERVICE**

I certify that I have this day caused to be sent the foregoing *Status Report*, in the following manner to the respective addressees below:

Original and copy by facsimile, Overnight Mail to:

Karen Maples Regional Hearing Clerk Region II U.S. Environmental Protection Agency 290 Broadway, 16<sup>th</sup> Floor New York, NY 10007-1866 Fax (212) 637-3202.

Copy by facsimile, **Overnight Mail** to: Attorney for Respondent:

Copy by facsimile, **Overnight Mail** to: Chief Administrative Law Judge

Honorable Susan L. Biro Office of Administrative Law Judges U.S. Environmental Protection Agency 1099 14<sup>th</sup> Street, N.W., Suite 350 Washington, D.C. 20005 Fax (202) 565-0044.

pril 4, 2012

Name