

# MANKO GOLD KATCHER FOX

AN ENVIRONMENTAL AND ENERGY LAW PRACTICE

Bryan P. Franey  
484-430-2308  
bfraney@mankogold.com

Admitted in PA and NJ

401 CITY AVENUE, SUITE 901  
BALA CYNWYD, PA 19004  
TEL: 484-430-5700  
FAX: 484-430-5711  
WWW.MANKOGOLD.COM

April 27, 2015

Via Overnight Mail

Helen Ferrara  
Regional Judicial Officer  
U.S. Environmental Protection Agency  
Region 2  
290 Broadway, 16th Floor  
New York, NY 10007-1866

Re: Docket No. CWA-02-2015-3401

Dear Ms. Ferrara:

Enclosed please find a Motion requesting an extension of time to file an Answer in the matter of The Skydyne Company, Docket No. CWA-02-2015-3401. Please contact me if you have any questions.

Respectfully submitted,



Bryan P. Franey  
For MANKO, GOLD, KATCHER & FOX, LLP

BFP/nav/12368-001

Enclosure

cc: Karen Maples, Regional Hearing Clerk (Via Overnight Mail)  
Kara Murphy, Office of Regional Counsel (Via Email and First Class Mail)

PHILADELPHIA, PA  
\*CHERRY HILL, NJ  
WILLIAMSPORT, PA

by appointment only

\*Partner responsible - Bruce S. Katcher

REGIONAL HEARING  
CLERK  
2015 APR 28 AM 11:50  
U.S. Environmental  
Protection Agency-Reg 2

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2

U.S. Environmental  
Protection Agency-Reg 2  
2015 APR 28 AM 11: 51

REGIONAL HEARING  
CLERK

---

IN THE MATTER OF: :  
: :  
The Skydyne Company :  
: :  
Respondent :  
: :  
: :

---

Docket No. CWA-02-2015-3401

**MOTION FOR EXTENSION OF TIME TO FILE ANSWER**

Pursuant to 40 C.F.R. § 22.16, Respondent, The Skydyne Company (“Skydyne”), requests that the Regional Judicial Officer grant another sixty (60) day extension of time for Respondent to file an Answer in this proceeding.

Respondent received the Complaint on February 9, 2015. By Order dated March 10, 2015, the Regional Judicial Officer extended the date by which Skydyne may file an Answer to May 11, 2015.

The parties conferred by telephone on February 25, 2015 and on April 15, 2015 and both parties continue to express an interest in a possible settlement of this matter. The parties have also exchanged information and intend to hold further discussions concerning this matter within the next several weeks. Accordingly, Respondent believes that, at this time, the parties’ resources would best be spent on continued settlement negotiations rather than on preparation of an Answer to the Complaint.

Kara Murphy, EPA Region 2 legal counsel in this proceeding, confirmed by email on April 27, 2015 that EPA would not oppose this motion.

Respondent therefore respectfully requests that the Regional Judicial Officer grant this motion for an additional sixty (60) day extension of time, from May 11, 2015 to July 10, 2015 for Respondent to file its Answer.

Respectfully submitted,

Dated: April 27, 2015



Bryan P. Franey  
Manko, Gold, Katcher & Fox, LLP  
401 City Avenue  
Suite 901  
Bala Cynwyd, PA 19004  
(484) 430-2308

Attorney for Respondent  
The Skydyne Company

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Motion for Extension of Time to File an Answer was delivered in the following manner to the addressees listed below:

**Original and One Copy by Overnight Mail:**

Karen Maples, Regional Hearing Clerk  
U.S. Environmental Protection Agency, Region 2  
290 Broadway, 16th Floor (Room 1631)  
New York, NY 10007-1866

**One copy by Overnight Mail:**

Helen Ferrara, Regional Judicial Officer  
U.S. Environmental Protection Agency, Region 2  
290 Broadway, 16th Floor  
New York, NY 10007-1866

**One copy by First Class Mail and E-mail:**

Kara Murphy, Office of Regional Counsel  
U.S. Environmental Protection Agency, Region 2  
290 Broadway, 16th Floor  
New York, NY 10007-1866

Date Sent: 4-27-15

Signed: 