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Ferro Corporation

U.S. ENVIRONMENTAL
PROTECTION AGENCY-REG.11
2011 DEC -2 A 10:40
REGIONAL HEARING
CLERK

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY

BEFORE THE ADMINISTRATOR

In the Matter of:)
)
FERRO CORPORATION,) Docket No. CAA-02-2011-1217
)
Respondent.)

MOTION FOR EXTENSION OF TIME

Comes now Respondent, Ferro Corporation, by and through its counsel, pursuant to Rule 22.7(b) of the Consolidated Rules of Practice (40 C.F.R. §22.7(b)) and respectfully requests an additional sixty (60) day extension of time to file its Answer and Request a Hearing and as good cause therefore states as follows:

Respondent received the Complaint on September 30, 2011. The Complaint alleges violations of a variety of complex technical regulations that require Respondent to perform a review of extensive recordkeeping. Therefore, Respondent needed additional time to perform this review as well as other fact finding. Moreover, Respondent requested additional time to engage in an informal settlement conference with the Complainant. Respondent and Complainant also needed to establish a date for an the informal settlement conference. On October 18, 2011, Your Honor kindly issued an Order Granting an Extension of Time until December 30, 2011 to file the Answer.

Respondent and Complainant engaged in an informal settlement on November 15, 2011. Respondent requests an additional sixty (60) day extension until February 29, 2012 to allow for the exchange of settlement documents.

Prior to filing this Motion, the undersigned contacted the opposing party as to the extension requested herein and said opponent indicated that it does not oppose the Motion.

Ellen Radow Sadat
Ellen Radow Sadat, Esq.

December 1, 2011
Date

CERTIFICATE OF SERVICE

I certify that the foregoing MOTION FOR EXTENSION OF TIME, dated, December 1, 2011, was sent this day in the following manner to the addressees listed below:

Original by Overnight Mail to: Karen Maples
 Regional Hearing Clerk
 United States Environmental Protection Agency, Region 2
 290 Broadway, 16th Floor
 New York, New York 10007-1866

Copy by Overnight Mail and facsimile to:

Attorney for Complainant:

Kara E. Murphy
Assistant Regional Counsel
U.S. EPA, Region 2
290 Broadway, 16th Floor
New York, New York 10007
Tel: (212) 637-3211
Fax: (212) 637-3199

Presiding Judge: The Honorable Helen S. Ferrara
 Regional Judicial Officer
 United States Environmental Protection Agency, Region 2
 290 Broadway, 16th Floor
 New York, New York 10007-1866



Ellen Radow Sadat, Esq.

Dated: December 1, 2011