

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2

U.S. ENVIRONMENTAL
PROTECTION AGENCY-REG. II

2007 DEC 19 PM 3: 54

REGIONAL HEARING
CLERK

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In the Matter of :
 :
Jose R. Martinez Coello :
Finca Los Tres Picachos :
 :
Respondent. :
-----X

Docket No. FIFRA-02-2008-5305

JOINT MOTION FOR EXTENSION OF TIME TO ANSWER

Attached please find Respondent's Motion Requesting Extension of Time To Answer The Complaint which requests a 45-day extension of time to Answer. Due to the holiday closure of Respondent's office from December 21, 2007 to January 7, 2008, Complainant and Respondent have discussed and concurred on a request for a 3-month extension of time.

The Complaint was served by Overnight Delivery on October 31, 2007, and received by Respondent on November 1, 2007. The Answer was due on December 3, 2007. Pursuant to Sections 22.7 and 22.16 of Title 40 of the Code of Federal Regulations and for the reasons stated in Respondent's Motion, Complainant and Respondent jointly request a 3-month extension of time, through and including March 3, 2008.

Respectfully submitted,



Karen L. Taylor, Esq.
Office of Regional Counsel
U.S. Environmental Protection Agency, Region 2
290 Broadway, 16th floor
New York, NY 10007-1866
phone: (212) 637-3637
facsimile: (212) 637-3199

Dated: December 18, 2007

In the Matter of Jose R. Martinez Coello, Finca Los Tres Picachos
Docket No. FIFRA-02-2008-5305

CERTIFICATE OF SERVICE

I certify that I have this day caused to be sent the foregoing JOINT MOTION FOR EXTENSION OF TIME TO ANSWER, bearing the above-referenced docket number, in the following manner to the respective addressees below:

Original and One Copy
by Hand:

Office of Regional Hearing Clerk
U.S. Environmental Protection
Agency - Region 2
290 Broadway, 16th floor
New York, NY 10007-1866

Copy
by Hand:

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

Copy by First Class Mail
Copy by facsimile at (787) 284-6292

Lcdo. Alberto L. Ramos Perez
PO Box 750
Mercedita, PR 00715-0750

Dated: 12-18-07
New York, NY

KLJall

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2

IN MATTER OF JOSE R. MARTINEZ COELLO FINCA LOS TRES PICACHOS PR. #539 KM 2.7 JAYUYA, PUERTO RICO RESPONDENT	COMPLAINT AND NOTICE OF OPPORTUNITY FOR HEARING DOCKET NO. FIFRA-02-2008-5305
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**MOTION REQUESTING EXTENTION OF TIME TO ANSWER THE
COMPLAINT**


Here comes respondent represent by the undersigned attorney who's ALLEGED, PRAY and REQUEST as follows,

1. That our service was contracted today by Respondent.
2. That in order to make a responsible answer to the complaint, we are requesting an extension of time of 45 days. (Due to the Christmas period our office will be closed from December 21 to January 7, 2008).
3. Also, Respondent is requesting a hearing in this case and will explore the possibility to settle this matter informally.

Therefore Respondent respectfully requests an extension of time of 45 days to submit the answer to the complaint.

I certify that copy of this motion was sent to Ms. Karen L. Taylor, Esq. Offices of Regional Counsel, US. EPA- Region 2, 290 Broadway Ave., 16th Floor New York, NY 10007-1866.

Respectfully submitted today December 3 2007.



ALBERTO L. RAMOS PEREZ
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