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REGIONAL HEARING CLERK

March 26, 2013

VIA FEDERAL EXPRESS AND E-MAIL

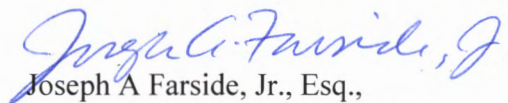
Wanda Santiago, Regional Hearing Clerk
U.S. Environmental Protection Agency, Region I
5 Post Office Square, Suite 100
Mailcode ORA 18-1
Boston, MA 02109-3912

Re: In the Matter of Maritime International, Inc., Docket Nos. CAA-01-2102-0106, CERCLA-01-2012-0107, EPCRA-01-2012-0108

Dear Ms. Santiago:

Enclosed please find a Fourth Assented-To Motion for Extension of Time to Answer with regard to the above-captioned action. The current date for Respondents to file their Answer is April 1, 2013. The Motion seeks an extension of 40 days to May 10, 2013.

Sincerely,



Joseph A Farside, Jr., Esq.,
on behalf of Respondents
Connecticut Freezers, Inc., and Maritime
International, Inc.

cc: Catherine Smith, Esq., EPA Region 1

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I



In the Matter of:)
)
Connecticut Freezers, Inc. and)
Maritime International, Inc.)
)
1 Brewery Street)
New Haven, CT)
)
Respondents.)
)
Proceeding under Section)
113(d) of the Clean Air Act,)
42 U.S.C. § 7413(d); Section)
109(b) of the Comprehensive)
Environmental Response,)
Compensation, and Liability Act,)
42 U.S.C. § 9609(b); and Section)
325(b) of the Emergency Planning)
and Community-Right-to-Know Act,)
42 U.S.C. § 11045(b))

Docket Numbers
CAA-01-2012-0106
CERCLA-01-2012-0107
EPCRA-01-2012-0108

**FOURTH ASSENTED-TO MOTION FOR EXTENSION OF TIME TO RESPOND TO
COMPLAINT AND NOTICE OF OPPORTUNITY FOR HEARING**

Respondents hereby move for an additional extension of time to file their Answer(s) in the above-captioned action. The current due date for the Answer is April 1, 2013. This Motion seeks an extension to forty (40) days after the Answer is currently due, or to May 10, 2013, for Respondents to file their Answer.

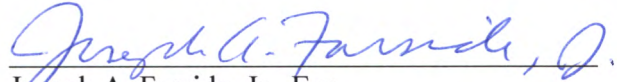
In support, Respondents submit that consultations with the EPA regarding a global settlement of this matter have resulted in an agreement-in-principle for settlement. However, consultations are ongoing concerning various settlement-related details. Additional time is necessary to achieve closure on these discussions without the need for further litigation in light of schedules both among essential Maritime personnel and its consultants, as well as essential personnel within EPA. A 40-day extension of time will serve the important purpose of permitting Respondents and EPA to continue such progress with the real expectation that it will result in a full and final global resolution within the extended time period.

Counsel for EPA has indicated that she is not opposed to the extension.

Respectfully submitted,

CONNECTICUT FREEZERS, INC. and
MARITIME INTERNATIONAL, INC.

By their attorneys,



Joseph A. Farside, Jr., Esq.

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Boston, MA 02199

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Date: March 26, 2013

In the Matter of Maritime International, Inc.

Docket Nos.:

CAA-01-2102-0106

CERCLA-01-2012-0107

EPCRA-01-2012-0108

CERTIFICATE OF SERVICE

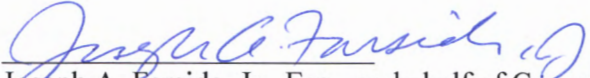
I hereby certify that the foregoing Fourth Motion to Extend Time to Answer was sent via Federal Express and filed with the Regional Hearing Clerk's office at the following address:

Wanda Santiago
Regional Hearing Clerk
U.S. Environmental Protection Agency, Region I
5 Post Office Square, Suite 100
Mailcode ORA 18-1
Boston, MA 02109-3912

and that a copy was sent to Complainant by first class mail and e-mail at the following address:

Catherine Smith, Esq.
EPA Region 1
Office of Environmental Stewardship
Mailcode OES 4-04
5 Post Office Sq., Suite 100
Boston, MA 02019-3912

Date: 3-26-13


Joseph A. Farside, Jr., Esq., on behalf of Connecticut
Freezers, Inc., and Maritime International, Inc.