

EVANS LAW FIRM, P.C.

ATTORNEYS AT LAW
817 WEST U.S. HIGHWAY 50
O'FALLON, IL 62269
(618) 628-9092
FAX (618) 628-9823
ofallonillawyer.com

PAUL J. EVANS

LICENSED IN
ILLINOIS AND MISSOURI

EVANSLAW@wisperhome.com

ANGELA DAVIDSON-GARLICK,
ASSOCIATE

LICENSED IN
ILLINOIS AND MISSOURI

Davidson-garlick@wisperhome.com

October 12, 2011

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Via Federal Express

Regional Hearing Clerk (E-19J)
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, IL 60604

REGIONAL HEARING CLERK
U.S. ENVIRONMENTAL
PROTECTION AGENCY

RE: In re the Matter of Babic Rental Ventures, LLC
Belleville, IL

Dear Sir or Madam:

Enclosed please find an original and one copy of Motion for Additional Time, relative to the above-captioned matter.

Thank you.

Very truly yours,


Angela Davidson-Garlick

ADG:tad
Enclosure
cc: Mr. John Tielsch (w/enc.)

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

In the Matter of)
)
)
Babic Rental Ventures, LLC)
Belleville, Illinois,)
)
Respondent,)

)Docket No. TSCA-05-2011-0018

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MOTION FOR ADDITIONAL TIME

**REGIONAL HEARING CLERK
U.S. ENVIRONMENTAL
PROTECTION AGENCY**

COMES NOW Respondent, Babic Rental Ventures, LLC, by and through
counsel, Paul J. Evans and Angela Davidson-Garlick of the Evans Law Firm,
P.C., and for and in support of its Motion for Additional Time, states as follows:

1. Respondent was served with EPA's complaint on September 14, 2011.
2. Respondent has been in ongoing settlement discussion with the EPA concerning this matter.
3. Due to the parties' ongoing discussions, Respondent was unaware that a Complaint was going to be filed.
4. Additionally, due to continued settlement discussion with the EPA after the Complaint was filed, Respondent believed no answer or other responsive pleading would need to be filed.
5. Respondent was informed by EPA counsel on Thursday, October, 6, 2011 that an answer would in fact need to be filed.
6. Due to the late date and Respondent's schedule, Counsel requests an additional 21 days to provide its responsive pleading or alternatively reach a resolution with the EPA.
7. Granting an additional amount of time in order for Respondent to file a response is necessary to protect Respondent's interests, is in good faith, and is not meant to harass or delay the judicial process.
8. Counsel for the Complainant has no objection to Respondent's request for additional time.

WHEREFORE, Respondent, BABIC RENTAL VENTURES, LLC, by and through its attorneys, Paul J. Evans and Angela Davidson-Garlick of the Evans Law Firm, P.C., pray this Court to enter an Order granting Respondent as additional 21 days to file its responsive pleadings to the EPA's Complaint and for such other relief as the Court deems just and reasonable.

Respectfully Submitted,

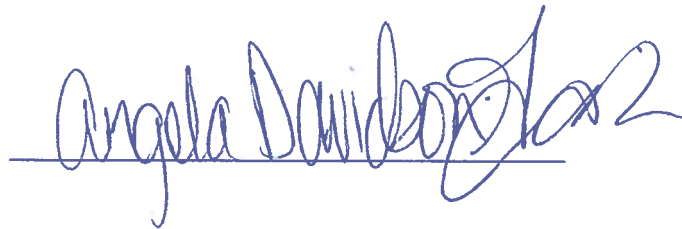


Paul J. Evans, #6201148
Angela Davidson-Garlick, #6294944
Attorney at Law
817 West U.S. Highway 50
O'Fallon, IL 62269
(618) 628-9092

CERTIFICATE OF SERVICE

Under penalties as provided by law, the undersigned certifies that a copy of the foregoing instrument was served upon each party, or attorney of record, by enclosing the same in an envelope addressed to each, at the address stated below, with postage fully prepaid, and by depositing said envelope in a U.S. Post Office mail box in O'Fallon, Illinois, prior to 5:00 p.m. on the 12th day of October, 2011.

Mr. John Tielsch,
Counsel for Complainant/C-14J
Region 5
77 W. Jackson Blvd.
Chicago, IL 60604-3590



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