

Robert R. Tyson, Esq.  
[rtyson@bsk.com](mailto:rtyson@bsk.com)  
P: 315.218.8221  
F: 315.218.8921

October 9, 2015

**VIA FEDERAL EXPRESS**

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

U.S. Environmental  
Protection Agency-Reg 2  
2015 OCT 14 AM 7:58  
REGIONAL HEARING  
CLERK

Re: *Mack Studios, Inc. and Peter Maciulewicz – Docket No. CWA-02-2015-3404*  
*Request for Extension*

Dear Judge Ferrara:

By Order dated July 6, 2015, the U.S. Environmental Protection Agency extended the time for Mack Studios, Inc. and Peter Maciulewicz (collectively "Mack Studios") to answer the Administrative Complaint in the referenced matter until October 15, 2015.

This letter is submitted to request an additional extension of time to answer the Complaint. Specifically, Mack Studios respectfully requests an extension until November 16, 2015 (30 days would be November 14, which is a Saturday), to serve an answer to the Complaint and, if necessary, to request a hearing in this matter. In support of this request, Mack Studios states that on September 20, 2015, Mack Studios submitted a proposal to EPA in connection with a potential settlement of this matter. We understand that EPA is continuing to review the proposal. Please note that EPA Assistant Regional Counsel Tim Murphy has consented to this request.

We are submitting the original of this letter and one copy to Karen Maples, the Regional Hearing Clerk, and an electronic copy of this letter to Mr. Murphy.

Thank you for your time and consideration, and please call if you have questions.

Hon. Helen S. Ferrara  
October 9, 2015  
Page 2

Sincerely,

BOND, SCHOENECK & KING, PLLC

By: 

Robert R. Tyson

Att: Certificate of Service

cc: Tim Murphy, Esq. (via e-mail only)  
Assistant Regional Counsel  
USEPA, Region 2  
290 Broadway, 16<sup>th</sup> Floor  
New York, NY 10007-1866

Karen Maples (via Federal Express)  
Regional Hearing Clerk  
USEPA, Region 2  
290 Broadway, 16<sup>th</sup> Floor  
New York, NY 10007-1866