

**U. S. ENVIRONMENTAL PROTECTION AGENCY  
REGION 7  
11201 RENNER BOULEVARD  
LENEXA, KANSAS**

**BEFORE THE ADMINISTRATOR**

In the Matter of:	)	
	)	
THE ASKINS DEVELOPMENT	)	Docket No. TSCA-07-2019-0280
GROUP, LLC	)	
	)	
Respondent.	)	
	)	

**RESPONDENT MOTION FOR EXTENSION OF TIME  
TO RESPOND TO COMPLAINANT’S MOTION FOR DEFAULT ORDER  
*(with consent from legal counsel for Complainant)***

COMES NOW Respondent The Askins Development Group, LLC, by and through the undersigned counsel, and respectfully request for good cause shown, and with the consent from legal counsel for Complainant, and by requested leave of the Administrator, for an additional ten (10) days from the date of the initial response due date, which is up to and including March 15, 2021, in which to answer or otherwise respond to:

1. Complainant’s Motion for Default Order;
2. Memorandum of Points and Authorities in Support of Complainant’s Motion for Default Order;
3. Exhibits A through I to Memorandum of Points and Authorities in Support of Complainant’s Motion for Default Order; and
4. Proposed Findings of Fact, Conclusions of Law, Default Order, and Initial Decision

in that counsel for Respondent needs the additional time in which to confer with Respondent in order to formulate the appropriate responses to said Complainant’s Motion for Default Order etc. and in light of the current state of COVID-19 emergency extant in the State of Missouri, and other particular states, as well as, surrounding counties and the executive orders issued in connection with the aforementioned state of emergency, it may not be acceptable to meet with Respondent in the near future to process said Complainant’s Motion for Default Order etc.

Dated: March 3, 2021

**KAZANAS LC**

By: /s/ Dan J. Kazanas  
DAN J. KAZANAS, MBN 31056  
321 West Port Plaza Drive, Suite 201  
Saint Louis, Missouri 63146  
(314) 499-8174 (Phone)  
(314) 499-8173 (Facsimile)  
[dan.kazanas@global-lawfirm.com](mailto:dan.kazanas@global-lawfirm.com)

ATTORNEYS FOR RESPONDENT

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that an exact copy of the foregoing pleading was sent electronically on March 3, 2021 to the following:

Michele Drennen,  
Regional Hearing Clerk  
U.S. Environmental Protection Agency, Region 7  
11201 Renner Blvd.  
Lenexa, KS 66219  
[R7\\_Hearing\\_Clerk\\_Filings@epa.gov](mailto:R7_Hearing_Clerk_Filings@epa.gov)

Britt Bieri, Attorney for Complainant  
Assistant Regional Counsel  
U.S. Environmental Protection Agency, Region 7  
11201 Renner Boulevard  
Lenexa, KS 66219  
[bieri.britt@epa.gov](mailto:bieri.britt@epa.gov)

**KAZANAS LC**

By: /s/ Dan J. Kazanas  
DAN J. KAZANAS, MBN 31056