

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

_____)	
In the Matter of:)	
)	
Brady Sullivan Millworks II, LLC and)	Docket No. TSCA-01-2016-0054
Brady Sullivan Millworks IV, LLC)	
670 N. Commercial Street, Suite 303)	
Manchester, New Hampshire)	
)	
Respondents)	ASSENTED TO
)	MOTION TO FURTHER
Proceeding under Section 16(a) of)	EXTEND ANSWER DATE
the Toxic Substances Control Act,)	FOR 45 DAYS
42 U.S.C. § 2615(a).)	
)	
_____)	

NOW COME, Brady Sullivan Millworks II, LLC and Brady Sullivan Millworks IV, LLC, (“Respondents”) by and through their attorney, Marc A. Pinard, Esquire, and respectfully request that this Honorable Court postpone for an additional 45 days the date upon which Respondents’ Answer is due for filing in this matter, and in support thereof state as follows:

1. The parties have substantially concluded the negotiation process relative to the settlement of this matter and are currently working with officials from the City of Manchester, New Hampshire on the details of the related Supplemental Environmental Project (“SEP”) that will be part of the settlement.
2. Despite the efforts of the parties, the details of the SEP cannot be concluded by the current Answer due date of December 29, 2016.

3. The parties believe that such details can be worked out within an additional 45 day period, at which time the settlement may be concluded.
4. Accordingly, the Respondents seek a further 45 day extension of the Answer due date from December 29, 2016 to February 12, 2017, which is a Sunday, with the next business day being Monday, February 13, 2017.
5. Respondents' counsel has sought and obtained assent to this Motion from EPA counsel, Attorney Andrea Simpson.

WHEREFORE, Respondents therefore respectfully request:

- A. A postponement of the Answer due date from December 29, 2016 to February 12, 2017 which is a Sunday, with the next business day being Monday, February 13, 2017; and
- B. Such other and further relief as justice requires.

Dated: December 16, 2016

Respectfully submitted,
RESPONDENTS:
Brady Sullivan Millworks II, LLC and
Brady Sullivan Millworks IV, LLC
By:



Marc A. Pinard, General Counsel
BBO # 551715; NH Bar # 4117
Brady Sullivan Properties
670 N. Commercial Street
Manchester, NH 03101
(603) 622-6223

CERTIFICATE OF SERVICE

I, Marc A. Pinard, Esquire, certify that on this date I provided a copy of the foregoing Motion by forwarding the same by electronic mail to EPA Counsel, Attorney Andrea Simpson to simpson.andrea@epa.gov.



Marc A. Pinard, BBO # 551715; NH Bar # 4117