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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

BEFORE THE ADMINISTRATOR

In the Matter of:)	
TERRO CORROL MICH)	1 33 63 63 63 63 63 63 63 63 63 63 63 63
FERRO CORPORATION,)	Docket No. CAA-02-2011-1217
Respondent.)	

MOTION FOR EXTENSION OF TIME

Comes now Respondent, Ferro Corporation, by and through its counsel, pursuant to Rule 22.7(b) of the Consolidated Rules of Practice (40 C.F.R. §22.7(b)) and respectfully requests an additional ninety (90) day extension of time to file its Answer and Request a Hearing and as good cause therefore states as follows:

Respondent received the Complaint on September 30, 2011. Respondent requested additional time to engage in an informal settlement conference with the Complainant. Respondent and Complainant also needed to establish a date for the informal settlement conference. On October 18, 2011, Your Honor kindly issued an Order Granting an Extension of Time until December 30, 2011 to file the Answer.

Respondent and Complainant engaged in an informal settlement on November 15, 2011. Respondent requested and on December 7, 2011, Your Honor kindly issued an additional sixty (60) day extension until February 29, 2012 to allow for the exchange of settlement documents. Respondent and Complainant respectfully request an additional ninety (90) day extension until May 29, 2012 to exchange settlement documents.

Prior to filing this Motion, the undersigned contacted the opposing party as to the
extension requested herein and said opponent indicated that it does not oppose the Motion.

February 10, 2012
Date

PR01/1171933.3

CERTIFICIATE OF SERVICE

I certify that the foregoing MOTION FOR EXTENSION OF TIME, dated, February 10, 2012, was sent this day in the following manner to the addressees listed below:

Original by Overnight Mail to:

Karen Maples

Regional Hearing Clerk

United States Environmental Protection Agency, Region 2

290 Broadway, 16th Floor

New York, New York 10007-1866

Copy by Overnight Mail and facsimile to:

Attorneys for Complainant:

Kara E. Murphy and Jacob Hollinger

Assistant Regional Counsel

U.S. EPA, Region 2

290 Broadway, 16th Floor New York, New York 10007

Tel: (212) 637-3211 and (212) 637-3228

Fax: (212) 637-3199

Presiding Judge:

The Honorable Helen S. Ferrara

Regional Judicial Officer

United States Environmental Protection Agency, Region 2

290 Broadway, 16th Floor

New York, New York 10007-1866

Ellen Radow Sadat, Esq.

Dated: February 10, 2012