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January 25, 2013

Lorena Vaughn (6RC-D)
Regional Hearing Clerk
U.S. EPA Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 7502-2733

Re: Administrative Complaint; Docket Number CWA-06-2012-2710

Dear Lorena Vaughn:

Enclosed is the original and one copy of a Motion for Extension of Time, by which we are requesting until the end of February within which to file an Answer in the above referenced matter. We have discussed this with Attorney Tucker Henson, who indicates that EPA would have no objection to this extension.

Please return to me in the enclosed Self Addressed Stamped Envelope a copy of the Motion stamped with the date and time of filing.

Your courtesies are appreciated.

Sincerely,



Robert W. Morgan

cc: T. Henson
G. Swain

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 6

FILED
2013 JAN 31 PM 3:44
REGIONAL HEARING CLERK
EPA REGION VI

In the Matter of: * Docket No. CWA-06-2012-2710
*
* Proceeding to Assess a
Paco Swain Realty, L.L.C. * Civil Penalty Under Section 309(g)
A Louisiana Corporation, * of the Clean Water Act
*
Respondent * Administrative Complaint

MOTION FOR EXTENSION OF TIME


Comes now Paco Swain Realty, L.L.C., through its undersigned counsel, pursuant to Rule 22.7 (b) of the Consolidated Rules of Practice (40 C.F.R. §22.7(b)) and respectfully requests an extension of time until February 28, 2013 within which to file its Answer, and as good cause therefor states as follows:

Counsel was recently retained to represent Respondent in this case, which involves numerous and complex allegations and issues. Counsel will be out of his office from January 29 until February 4, 2013, and does not have adequate time to prepare a comprehensive answer by the due date while attending to matters for which he is already responsible.

Prior to filing this Motion, the undersigned contacted Complainant through its Assistant Regional Counsel, who indicated that the Complainant does not oppose the Motion.

By Attorney:

1/25/2013
Date


ROBERT W. MORGAN La.Bar # 9713
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Denham Springs, Louisiana 70726
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Facsimile 225.271.8881
morganlaw@bellsouth.net
Counsel for Respondent

CERTIFICATE OF SERVICE

I certify that the foregoing Motion, dated January 25, 2013, was this day sent by Regular

Mail to:

Lorena Vaughn (6RC-D)
Regional Hearing Clerk
US EPA Region 6
1445 Ross Avenue Suite 1200
Dallas TX 75202-2733
(Original)

Tucker Henson (6RC-EW)
US EPA Region 6
1445 Ross Av
Dallas TX 75202-2733
(Copy)



Robert W. Morgan
212 N Range AV
Denham Springs LA 70726

Dated: January 25, 2013