



U.S. Environmental  
Protection Agency-Reg 2

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REGIONAL HEARING  
CLERK

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January 22, 2015

**Sent via Email and Regular Mail**

Helen S. Ferrara, Regional Judicial Officer  
US Environmental Protection Agency  
290 Broadway, 16<sup>th</sup> Floor  
New York, NY 10007-1866

**Re: Informal Request For a Further Extension of Time  
City of Atlantic City Municipal Separate Storm Sewer System ("MS4")  
Docket No. CWA-02-2014-3403**

Dear Judge Ferrara:

Last month, the City of Atlantic City requested and received an Extension of Time to File An Answer To the Complaint in the above-captioned matter while settlement discussions were on-going with EPA. That extension expires on January 23, 2015. Progress has been made and while I believe the parties are close to a resolution, additional time is required to vet financial information generated by the City.

We therefore request an additional extension of time, specifically sixty (60) days, within which to complete the exchange of information, address the Agency's questions, and arrive at an agreed-upon settlement. This request is being made with the support of the Regional Counsel and Agency representatives.

A Certificate of Service is also enclosed. If you have any questions, please don't hesitate to contact me at 856-321-2402. Thank you.

Sincerely yours,

Catherine M. Ward

Helen S. Ferrara, Regional Judicial Officer

January 22, 2015

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Enclosure

cc: Karen Maples, Regional Hearing Clerk ✓  
Eduardo J. Gonzalez, Esq., Office of Regional Counsel, USEPA  
Christy Arvizu, Program Officer, Division of Enforcement and Compliance Assistance  
Water Compliance Branch  
Justine Modigliani, P.E., Chief, Compliance Section / Water Compliance Branch  
Marcedius T. Jameson, Director, Division of Water & Land Use Enforcement, NJDEP  
City of Atlantic City

CERTIFICATE OF SERVICE

I hereby certify that the Informal Request For a Further Extension of Time on behalf of the City of Atlantic City in the matter of City of Atlantic City Municipal Separate Storm Sewer System ("MS4"), Docket No. CWA-02-2014-3403 was served on the parties as identified below by Email and First Class Mail:

Helen S. Ferrara  
Regional Judicial Officer  
USEPA – Region II  
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Assistant Regional Counsel  
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Catherine M. Ward, Esq.

Date: January 22, 2015