

IN THE MATTER OF:  
Edward Franco  
d/b/a El Paso Management  
15 Rutland Square  
Brockton, MA. 02301

80 Bragdon Realty Trust  
Carmen R. Vasquez as Trustee  
3 Farrington Lane  
Canton MA 02021

First West Fourth, LLC  
1372 Hancock Street Suite 401  
Quincy, Ma 02169

Respondents.

DOCKET NO. TSCA-01-2012-0022

RECEIVED  
JUL 19 2012  
EPA ORC WS  
Office of Regional Hearing Clerk

July 17, 2012

**RESPONDENT'S MOTION FOR EXTENSION OF TIME TO PLEAD**

Respondent Edward Franco d/b/a El Paso Management, 80 Bragdon Realty Trust, First West Fourth Realty Trust (the "Respondent") hereby moves for an additional thirty-day extension of time, to file an answer to the Complaint and Notice of Opportunity for Administrative Hearing (the "Complaint"), filed by the United States Environmental Protection Agency, Region 1 (the "Complainant"), dated March 29, 2012.

This is the third request for an extension of time relating to this action.

Understanding that he has past the previous deadline of July 2, 2012, the Respondent wants to continue to explore settlement possibilities and needs time to meet with representatives of the EPA. Settlement work is ongoing and a resolution is expected.

The undersigned has spoken with the Complainant and Complainant consents to a thirty-day extension.

**THE RESPONDENT,**  
Edward Franco d/b/a El Paso Management

By: 

Edward Franco d/b/a El Paso Management  
80 Bragdon Realty Trust  
First West Fouth LLC  
Telephone: (508) 588-7744  
Facsimile: (508) 588-5566