

McLane

McLane, Graf,
Raulerson & Middleton
Professional Association

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GREGORY H. SMITH
Email: greg.smith@mclane.com
Admitted in NH

June 12, 2012

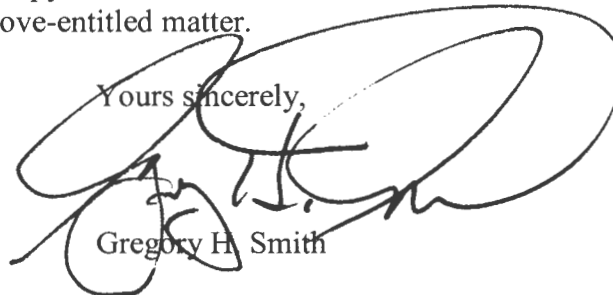
Wanda I. Santiago
Regional Hearing Clerk
U.S. EPA, Region 1
5 Post Office Square
Suite 100, (Mail Code: ORA 18-1)
Boston, MA 02109-3912

**RE: CSG Holdings, Inc. Complaint and Notice of Opportunity for Hearing
EPA Docket No. CWA-01-2012-0032**

Dear Ms. Santiago:

I enclose an original and one copy of an Assented-to Motion for Third Extension of Time to Answer with regard to the above-entitled matter.

Yours sincerely,



Gregory H. Smith

GHS:cb
Enclosure

cc: Laura J. Berry, Esq.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1

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2012 JUN 15 P 11: 12

_____) Docket No. CWA-01-2012-0032
IN THE MATTER OF:)
)
CSG HOLDINGS, INC (f/k/a) **ASSENTED TO MOTION FOR THIRD**
COLUMBIA SAND & GRAVEL,) **EXTENSION OF TIME FOR**
INC.)) **RESPONDENT TO RESPOND TO EPA'S**
COLUMBIA, NH) **ADMINISTRATIVE COMPLAINT AND**
) **NOTICE OF OPPORTUNITY TO**
) **REQUEST A HEARING**
Respondent.)
)
Proposing to Assess a Civil Penalty)
Under Section 309(g) of the Clean)
Water Act, 33 U.S.C. § 1319(g))

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ASSENTED-TO MOTION FOR THIRD EXTENSION OF TIME TO ANSWER

NOW COMES Respondent, CSG Holdings, Inc., by and through its attorneys, McLane, Graf, Raulerson & Middleton, Professional Association, and hereby moves for a third extension of time to file a written request for hearing and an Answer, to August 6, 2012. In support of this motion, Respondent states as follows:

1. On May 15, 2012, the Regional Judicial Officer granted a second extension of time for Respondent to file an Answer by June 22, 2012.
2. The parties are engaged in settlement discussions, are making progress toward resolving this matter, and believe that an extension of time will be useful in advancing these ongoing efforts. An efficient resolution of this matter will reduce time and expense for the parties and this tribunal.
3. No prejudice to any party will result from granting this motion.
4. All parties assent to this motion.

WHEREFORE, Respondent CSG Holdings, Inc. respectfully requests:

- A. That the period for entering into a settlement or filing an Answer to the Complaint be extended to August 6, 2012; and
- B. For such other and further relief as the judicial officer deems appropriate.

Respectfully submitted,

CSG HOLDINGS, INC.

By its Attorneys

McLane, Graf, Raulerson
& Middleton, P.A.

Dated June 12, 2012

By: 

Gregory H. Smith
Michael J. Walls
Jarrett B. Duncan
11 South Main Street
Suite 500
Concord, NH 03301
(603) 230-4401
gsmith@mclane.com

In the matter of CSG Holdings, Inc. Docket No. CWA-01-2012-0032

CERTIFICATE OF SERVICE

I hereby certify that on June 12, 2012, I sent the foregoing "Assented-to Motion for Second Extension of Time for Respondent to Respond to EPA's Administrative Complaint and Notice of Opportunity to Request a Hearing" to the following persons, in the manner specified, and on the date below:

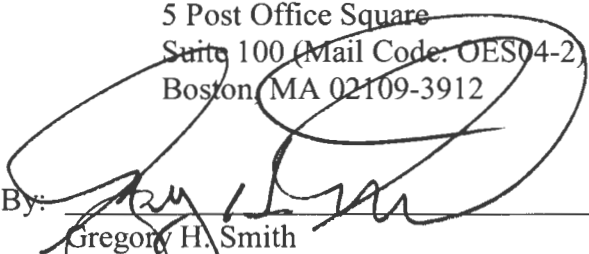
Original and one copy by First-Class Mail:

Wanda I. Santiago
Regional Hearing Clerk
U.S. EPA, Region 1
5 Post Office Square
Suite 100, (Mail Code: ORA 18-1)
Boston, MA 02109-3912

and via Electronic Mail to:

Laura J. Berry
Enforcement Counsel
U.S. EPA, Region 1
5 Post Office Square
Suite 100 (Mail Code: OES04-2)
Boston, MA 02109-3912

Dated: June 12, 2012

By: 

Gregory H. Smith
11 South Main Street
Suite 500
Concord, NH 03301