

\_\_\_\_\_  
IN THE MATTER OF: )  
)

JUAN HERNANDEZ )  
585 East Main Street )  
Bridgeport, Connecticut 06608 )

Respondent. )  
\_\_\_\_\_ )

RECEIVED

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2012 APR 26 P 12:24

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April 19, 2012

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

Respondent Juan Hernandez (the "Respondent") hereby moves for a thirty-day extension of time, through and including May 30, 2012, 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 27, 2012.<sup>1</sup>

This is the first request for an extension of time relating to this action. Due to the fact that the Respondent recently retained Cohen and Wolf, P.C. to represent him in this matter, the Respondent moves for an extension of time so that the Respondent can review the relevant documentation with counsel and respond appropriately to the allegations in the Complaint.

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

**THE RESPONDENT,  
JUAN HERNANDEZ**

By: /s/ Rachel A. Schwartzman 432997

Rachel A. Schwartzman, Esq.  
COHEN AND WOLF, P.C.  
1115 Broad Street  
Bridgeport, Connecticut 06604

<sup>1</sup> In a letter from the Complainant to the Respondent dated April 10, 2012, the Complainant told the Respondent to file an extension before April 30, 2012. In a subsequent conversation between the Complainant and the undersigned, both parties agreed that the thirty-day extension would be calculated from April 30, 2012.

**CERTIFICATION OF SERVICE**

I hereby certify that on the date hereof, a copy of the foregoing was served by U.S., mail, postage prepaid, upon all counsel and pro se parties of record, as follows:

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Regional Hearing Clerk  
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Steven Schlang  
Senior Enforcement Counsel  
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/s/ Rachel A. Schwartzman 432997  
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