

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 2

U.S. ENVIRONMENTAL
PROTECTION AGENCY-REG.11
2012 JUL 25 A 8 48
REGIONAL HEARING
CLERK

In the Matter of:

Municipality of Moca
P.O. Box 1571
Moca, Puerto Rico 00676-1571

**Complaint and Notice of
Opportunity to Request
Hearing**

Respondent

In a proceeding under Section 113(a) of the Clean
Air Act, 42 U.S.C. § 7413(a)

Index No.: CAA-02-2011-1216

**Motion Requesting Extension of Time to File Joint Set of Stipulated Facts, Exhibits and
Testimony**

COMES NOW Complainant, the U.S. Environmental Protection Agency (“EPA” or
“Complainant”) through the undersigned attorney, and respectfully alleges, prays and requests as
follows:

1. On April 18, 2012, this Honorable Court issued an Order Scheduling Hearing, which
ordered that the EPA and the Municipality of Moca (collectively referred herein as “the
Parties”) shall file a Joint Set of Stipulated Facts, Exhibits and Testimony.
2. Complainant herein requests an extension of time to file the Joint Set of Stipulated Facts,
Exhibits and Testimony, in consideration of the fact that the undersigned was out of the
office for several weeks, due to medical reasons and previous personal commitments.
Afterwards, counsel for Respondent has also been out of the office and the undersigned
has not been able to reach him. Several calls have been made to his office, which seems
to be closed during the last week.

3. As stated in Complainant's Status Report, on May 18, 2012, the Parties reached a settlement agreement and are working currently on the CA/FO. Complainant recognizes that it is in the best interest of all the parties involved to file the CA/FO as soon as possible. However, the Parties recognize their obligation to comply with this Honorable Court's schedule, and Complainant respectfully requests an extension of fifteen (15) days to file the Joint Set of Stipulated Facts, Exhibits and Testimony.
4. Complainant expects to have a fully executed CA/FO prior to the completion of the fifteen (15) days period requested herein. In which case, the Parties will submit the CA/FO to this Honorable Court.
5. Complainant respectfully requests a final extension of fifteen (15) days to submit the Joint Set of Stipulated Facts, Exhibits and Testimony or, in the alternative, the CA/FO.
6. The granting of fifteen (15) additional days to file the Joint Set of Stipulated Facts, Exhibits and Testimony will not result in undue delay or prejudice to Respondent.

Certificate of Service

I hereby certify that a true copy of this Status Report was served to: Alberto Ramos-Perez, Esq., P.P. Box 750, Mercedita, Puerto Rico, 00715-0750.

Respectfully submitted, in Guaynabo, Puerto Rico, this 20th day of July, 2012.



Carolina Jordán-García, Esq.
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U.S. Environmental Protection Agency - Region 2
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CERTIFICATE OF SERVICE

I certify that I have this day caused to be sent the foregoing **Complainant's Prehearing Exchange**, dated February 24, 2012, and bearing the above-referenced docket number, in the following manner to the respective addressees below:

Original and copy by Overnight Mail to:

Karen Maples
Regional Hearing Clerk
Region II
U.S. Environmental Protection Agency
290 Broadway, 16th Floor
New York, NY 10007-1866

Copy by Certified Mail, Return Receipt Requested to:

Attorney for Respondent:
Alberto L. Ramos, Esq.
Alberto L. Ramos Law Offices
PO Box 750
Mercedita, PR 00715-0750