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January 22, 2020

VIA U.S. MAIL & E-MAIL

Helen S. Ferrara, Regional Judicial Officer
U.S. Environmental Protection Agency, Region 2
290 Broadway, 16th Floor
New York, NY 10007
Ferrara.Helen@epa.gov

Re: In the Matter of Aladdin Packaging LLC
Docket No.: RCRA-02-2019-7110
Request for Extension of Time


Dear Helen Ferrara, RJO:

As you know, we represent Aladdin Packaging LLC ("Aladdin") in the above referenced matter. Currently, Aladdin's answer to the EPA's Complaint is due January 29, 2020. This serves as a request for an extension of Aladdin's time to answer the Complaint through February 14, 2020.

Aladdin and the EPA have been engaged in settlement discussions however additional time is necessary for the parties to continue settlement discussions. The parties are hopeful that the additional time may allow the parties to resolve this matter without the need for litigation. Furthermore, I have spoken with Gary Nurkin, Region 2 Assistant Regional Counsel in this proceeding who is copied on this correspondence, and he confirmed that EPA has no objections to our proposed extension.

For the reasons stated above and other good cause having been shown, we respectfully request that you grant an extension until February 14, 2020, for Aladdin to file its Answer.

Respectfully submitted,


Eric Grillé

cc: Karen Maples, Regional Hearing Clerk (*Via Certified Mail RRR*)
Gary Nurkin, Office of Regional Counsel (*Via Email: nurkin.gary@epa.gov & First Class Mail*)
Aladdin Packaging, LLC (*via First Class Mail & Email*)

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