Kingsbury Center, Suite 600, 350 W. Hubbard St., Chicago, II. 60654 | P. 312-447-2800 | F. 312-447-2899 | www.r3law.com



Jacqueline M. Vidmar (312) 447-2802 jacqueline.vidmar@r3law.com

May 28, 2013

Regional Hearing Clerk (E-19J) U.S. EPA, Region 5 77 West Jackson Boulevard Chicago, Illinois 60604

3 0 2013

REGIONAL HEARING CLERK U.S. ENVIRONMENTAL PROTECTION AGENCY

Re: Sun Chemical Corporation Docket Number: MM-05-2013-0005, EPCRA-05-2013-0012, CERCLA-05-2013-0008

Dear Sir/Madam:

Enclosed please find an original and one copy of Respondent's Motion for Extension of Time and Certificate of Service submitted on behalf of the Respondent in the above-referenced matter.

Please contact me if you have any questions or comments.

Sincerely,

Joyulans mille

Jacqueline M. Vidmar

JMV/jff Enclosures

Cc: Catherine Garypie (via email and regular mail) Ann L. Coyle (via email and regular mail)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5

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In the Matter of:

Sun Chemical Corporation Muskegon, Michigan Docket No. MM-05-2013-0005 EPCRA-05-2013-0012 CERCLA-05-2013-0008

Proceeding to Assess a Civil Penalty Under Section 109(b) of the Comprehensive Environmental Response, Compensation, and Liability Act, and Section 325(b)(2) of the Emergency Planning and Community Right-to-Know Act of 1986

Respondent.

MOTION FOR EXTENSION OF TIME

Respondent, Sun Chemical Corporation, by its attorneys, hereby requests an extension of time to file an Answer to Complainant's Complaint for a period of 10 days, to June 10, 2013. Complainant has advised Respondent that it does not oppose this request for an extension of time. The parties expect to resolve this matter without the need for a hearing.

WHEREFORE, Respondent respectfully requests that the deadline for filing an Answer to the Complaint be extended to June 10, 2013.

Respectfully submitted this 28th day of May 2013.

ROONEY RIPPIE & RATNASWAMY LLP

By:

Jacqueline M. Vidmar (IL #6198828) Attorney for Respondent

Jacqueline M. Vidmar Rooney Rippie & Ratnaswamy LLP 350 West Hubbard Street, Suite 600 Chicago, Illinois 60654 (312) 447-2800 Phone (312) 447-2899 Fax jacqueline.vidmar@r3law.com

REGIONAL HEARING CLERK U.S. ENVIRONMENTAL PROTECTION AGENCY

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5

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Respondent.

CERTIFICATE OF SERVICE

I hereby certify that on May 28, 2013, an original and a copy of a *Motion for Extension* of Time was filed with the Regional Hearing Clerk, U.S. EPA, Region 5, 77 West Jackson Boulevard, Chicago, Illinois 60604, and that a complete copy of same was served on Catherine Garypie (C-14J), Office of Regional Counsel, U.S. EPA, Region 5, 77 West Jackson Boulevard, Chicago, Illinois 60604, via regular mail and via email at garypie.catherine@epa.gov as well as to Ann L. Coyle, Regional Judicial Officer, U.S. EPA, Region 5, 77 West Jackson Boulevard, Chicago, Illinois 60604, via regular mail and via email at garypie.catherine@epa.gov.

ROONEY RIPPIE & RATNASWAMY LLP

By:

Jacqueline M. Vidmar (IL #6198828) Attorney for Petitioner

