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February 17, 2012

VIA FEDERAL EXPRESS

Karen Maples, Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 2
290 Broadway, 16th Floor
New York, New York 10007-1866

U.S. ENVIRONMENTAL
PROTECTION AGENCY-REG. 11
2012 FEB 22 A 7 58
REGIONAL HEARING
CLERK

RE: *Chase, et al, Respondents*
Docket No. RCRA-02-2011-7503

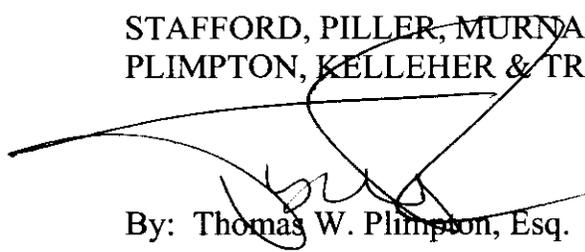
Dear Ms. Maples:

I enclose herewith the original and one copy of the Motion for Extension of Time to File a Response to the Motion for Accelerated Decision regarding the above matter.

Thank you for your consideration in this regard.

Very truly yours,

STAFFORD, PILLER, MURNANE,
PLIMPTON, KELLEHER & TROMBLEY, PLLC

By:  Thomas W. Plimpton, Esq.

TWP/taf
Enclosure

CC: Hon. M. Lisa Buschmann, Presiding Officer
Lee Spielmann, Esq.

U.S. ENVIRONMENTAL
PROTECTION AGENCY-REG.II
2012 FEB 22 A 7 58
REGIONAL HEARING
CLERK

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY

In the Matter of: Andrew B. Chase, a/k/a Andy
Chase, Chase Services, Inc., Chase Convenience
Stores, Inc., and Chase Commercial Land
Development, Inc.,

Respondents.

**MOTION FOR EXTENSION
OF TIME TO FILE RESPONSE
TO THE MOTION FOR AN
ACCELERATED DECISION**

Docket No. RCRA-02-2011-7503

Proceeding Under Section 9006 of the Solid
Waste Disposal Act, as amended.

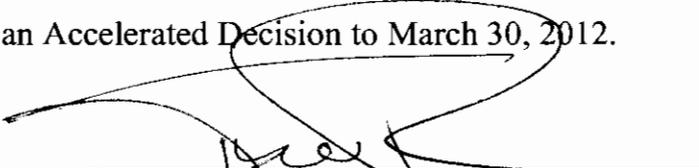
THOMAS W. PLIMPTON, ESQ., affirms to the Court, under penalty of perjury,
the following:

1. I am an attorney duly licensed to practice law in the State of New York, and a member of the firm of Stafford, Piller, Murnane, Plimpton, Kelleher & Trombley, PLLC, and attorney for the Respondents in the above matter. I make this Affirmation in support of Respondents' Motion for Extension of Time to File an Response to the Complainant's Motion for an Accelerated Decision.
2. The Motion for an Accelerated decision was filed with the Regional Hearing Clerk on February 10, 2012, making the Respondents' Response to the Motion due on February 25, 2012.

3. The Respondents received a copy of the Motion for an Accelerated Decision on February 14, 2012.
4. I am unable to respond to the Motion within the time allowed, due to other obligations. I am currently preparing an opposition to a Motion for Summary Judgment in a case pending in the United States District Court for the Northern District of New York, which is due February 29, 2012. I am also preparing a Brief for the Appellate Division, Third Judicial Department, which is due March 12, 2012
5. My office contacted Lee Spielmann regarding an extension of time to respond to the Motion for an Accelerated Decision to March 30, 2012, and Mr. Spielmann graciously consented to this request.
6. It is respectfully requested that Respondents be granted an extension of time in which to file and serve a Response to the Motion for an Accelerated Decision filed by the Complaint to March 30, 2012.

WHEREFORE, Respondents respectfully request that an extension of time be granted to file a Response to the Motion for an Accelerated Decision to March 30, 2012.

DATED: February 17, 2012.



THOMAS W. PLIMPTON, ESQ.