
IN THE MATTER OF:

Edward Franco

d/b/a El Paso Management

15 Rutland Square

Brockton, MA. 02301

80 Bragdon Realty Trust

Carmen R. Vasquez as Trustee

3 Farrington Lane

Canton MA 02021

First West Fourth, LLC

1372 Hancock Street Suite 401

Quincy, Ma 02169

Respondents.

DOCKET NO. TSCA-01-2012-0022

RECEIVED

APR 27 2012

EPA ORC *WS*
Office of Regional Hearing Clerk

April 25, 2012

RESPONDENT'S MOTION FOR EXTENSION OF TIME TO PLEAD

Respondent Edward Franco d/b/a El Paso Management, 80 Bragdon Realty Trust, First West Fourth Realty Trust (the "Respondent") hereby moves for a thirty-day extension of time, 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 29, 2012.

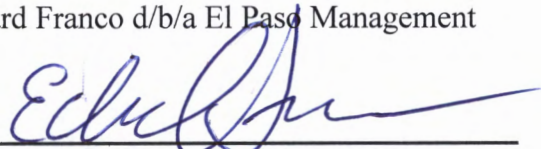
This is the first request for an extension of time relating to this action. Due to the fact that the Respondent wants to explore settlement possibilities and needs time to meet with representatives of the EPA.

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

THE RESPONDENT,

Edward Franco d/b/a El Paso Management

By: _____

A handwritten signature in blue ink, appearing to read "Edward Franco", written over a horizontal line.

Edward Franco d/b/a El Paso Management

80 Bragdon Realty Trust

First West Fourth LLC

Telephone: (508) 588-7744

Facsimile: (508) 588-5566

P.O. Box 374

Randolph, MA 02368

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:

Wanda I. Santiago
Regional Hearing Clerk
U.S. Environmental Protection Agency
Region 1
5 Post Office Square
Mail Code—ORA18-1
Boston, Massachusetts 02109-3912

Yen Hoang, Esq.
U.S. Environmental Protection Agency, Region 1
5 Post Office Square
Mail Code—ORA18-1
Boston Massachusetts 02109-3912

By: _____

Date: _____