

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 2

U.S. ENVIRONMENTAL
PROTECTION AGENCY-REGION 2
2009 APR -1 PM 2:39
REGIONAL HEARING
CLERK

<p>IN THE MATTER OF: 151-45 Sixth Road Whitestone Partners LLC. Trump Tower 725 Fifth Avenue, 24th Floor New York, New York 10022</p> <p>Respondent</p>	<p>DOCKET NO. CWA-02-2009-3401</p> <p>Proceeding pursuant to Section 309(g) of the Clean Water Act, 33 U.S.C. ' 1319(g)</p>
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JOINT MOTION FOR STAY OF PROCEEDINGS PENDING EXECUTION OF CONSENT
AGREEMENT AND FINAL ORDER

Region 2 of the United States Environmental Protection Agency ("the Region"), and 151-45 Sixth Road Whitestone Partners LLC ("Respondent"), jointly request that the Regional Judicial Officer grant a 60-day stay of the proceedings in the above-captioned matter.

The parties request the instant stay in order to execute a Consent Agreement and Final Order that will resolve the above-captioned matter.

Currently the parties have reached an agreement in principle which provides for a settlement consistent with the provisions and objectives of the Act and applicable regulations, therefore the parties request a stay until June 2, 2009.

For the reasons set forth above, the parties respectfully request that their Joint Motion for Stay of Proceeding Pending Execution of Consent Agreement and Final Order be granted and that the Regional Judicial Officer extend the deadline for the Respondent's response to June 2, 2009 without prejudice to Respondent's right to request re-activation of the proceedings if that should prove necessary.

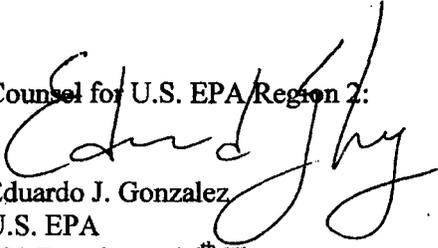
Respectfully submitted, this April 2, 2009,

Counsel for Respondent:



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Paul, Hastings, Janofsky & Walker LLP
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**JOINT MOTION FOR STAY OF PROCEEDINGS PENDING EXECUTION OF CONSENT AGREEMENT AND
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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 Broadway
New York, New York 10007-1866**

IN THE MATTER OF:

151-45 Sixth Road Whitestone Partners LLC
Trump Tower
725 Fifth Avenue, 24th Floor
New York, New York 10022

Respondent

Proceeding pursuant to §309(g) of the
Clean Water Act, 33 U.S.C. §1319(g)

**PROCEEDING TO ASSESS CLASS II
CIVIL PENALTY**

DOCKET NO. CWA-02-2009-3401

CERTIFICATE OF SERVICE

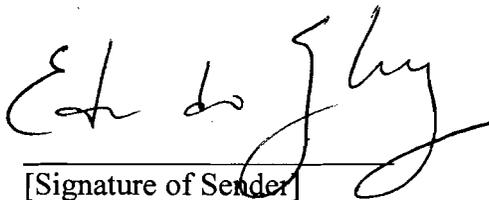
I certify that, on the date noted below, I caused to be mailed, by certified mail, return receipt requested, a copy of the foregoing "JOINT MOTION FOR STAY OF PROCEEDINGS PENDING EXECUTION OF CONSENT AGREEMENT AND FINAL ORDER" to the following persons at the addresses listed below:

Jesse Hiney, Attorney at Law
Paul, Hastings, Janofsky & Walker LLP
75 East 55th Street, New York, NY 10022
direct: 212 318 6578
main: 212 318 6000
direct fax: 212 230 5122

I [hand carried / mailed] the original and a copy of the foregoing Complaint to the office of the Regional Hearing Clerk, United States Environmental Protection Agency, Region 2.

Date:

4/3/2009



[Signature of Sender]