

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

_____)	
In the Matter of:)	
)	
Brady Sullivan Millworks II, LLC and)	Docket No. TSCA-01-2016-0054
Brady Sullivan Millworks IV, LLC)	
670 N. Commercial Street, Suite 303)	
Manchester, New Hampshire)	
)	
Respondents)	ASSENTED TO
)	MOTION TO
Proceeding under Section 16(a) of)	EXTEND ANSWER DATE
the Toxic Substances Control Act,)	FOR 30 DAYS
42 U.S.C. § 2615(a).)	
)	
_____)	

NOW COME, Brady Sullivan Millworks II, LLC and Brady Sullivan Millworks IV, LLC, (“Respondents”) by and through their attorney, Marc A. Pinard, Esquire, and respectfully request that this Honorable Court postpone for 30 days the date upon which Respondents’ Answer is due for filing in this matter, and in support thereof state as follows:

1. The parties are in the process of negotiating a potential settlement of this matter and are currently scheduled to meet to discuss the same on September 8, 2016.
2. Accordingly the Respondents seek a 30 day extension of the Answer due date from September 1, 2016 to October 1, 2016.
3. Respondents’ counsel has sought and obtained assent to this Motion from EPA counsel, Attorney Andrea Simpson.

WHEREFORE, Respondents therefore respectfully request:

- A. A postponement of the Answer due date from September 1, 2016 to October 1, 2016; and
- B. Such other and further relief as justice requires.

Dated: August 25, 2016

Respectfully submitted,
RESPONDENTS:
Brady Sullivan Millworks II, LLC and
Brady Sullivan Millworks IV, LLC
By:



Marc A. Pinard, General Counsel
BBO # 551715; NH Bar # 4117
Brady Sullivan Properties
670 N. Commercial Street
Manchester, NH 03101
(603) 622-6223

CERTIFICATE OF SERVICE

I, Marc A. Pinard, Esquire, certify that on this date I provided a copy of the foregoing Motion by forwarding the same by electronic mail to EPA Counsel, Attorney Andrea Simpson to simpson.andrea@epa.gov.



Marc A. Pinard, BBO # 551715; NH Bar # 4117