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Attorneys for Syngenta Seeds, LLC

**\*\* FILED \*\***  
01FEB2017 - 10:30AM  
U.S.EPA - Region 09

UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 HAWTHORNE STREET  
SAN FRANCISCO, CALIFORNIA, 94105

IN THE MATTER OF: )  
)  
SYNGENTA SEEDS, LLC ) Docket No.: FIFRA-09-2017-0001  
d/b/a Syngenta Hawaii, LLC, )  
)  
Respondent. ) RESPONDENT SYNGENTA SEEDS,  
) LLC'S UNOPPOSED MOTION FOR  
) EXTENSION OF TIME TO RESPOND TO  
) THE COMPLAINT  
\_\_\_\_\_ )

TO THE REGIONAL JUDICIAL OFFICER:

Pursuant to the authority set forth in the Consolidated Rules of Practice, 40 C.F.R. Part 22, Respondent Syngenta Seeds, LLC ("Respondent") moves the Regional Judicial Officer extend the time to respond to the complaint in the above-captioned action ("Complaint") by 14 days from February 22, 2017 to March 6, 2017. Respondent's reasons for seeking an extension of time are set forth below.

1. On December 14, 2016, Complainant U.S. Environmental Protection Agency, Region IX filed the Complaint and served Respondent.

2. On January 3, 2017, the Regional Judicial Officer granted the parties' joint motion for an extension of time to file an answer up to and including February 22, 2017.

3. Respondent is seeking an additional 14 days of time to respond to the Complaint, which if granted would mean that a response to the Complaint would be due on March 6, 2017.

4. Pursuant to 40 C.F.R. § 22.7(b), the Presiding Officer may grant an extension of time for filing any document, including an answer to the Complaint, upon the filing of a timely motion, for a good cause, and after consideration of prejudice to other parties. This motion satisfies these criteria

5. This motion is timely, having been filed prior to the date for Respondent's response to the Complaint.

6. There is good cause for granting the requested extension. Syngenta recently retained the undersigned counsel in this matter, as shown in the concurrently filed entry of appearance by John Conner Jr., Peter L. Gray and Amy Symonds of Dentons US, LLP. Respondent's counsel requires additional time to investigate the basis for EPA's Complaint. Additionally, Respondent is awaiting EPA's response to a Freedom of Information Act request, which will provide information necessary for responding to the Complaint.

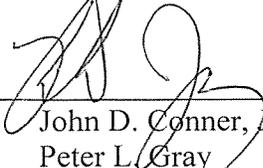
7. EPA has informed counsel for Respondent that the Agency does not oppose the requested extension. Neither party will be prejudiced by the requested extension.

For the reasons set forth above, Respondent respectfully requests that the Regional Judicial Officer grant Respondent's motion to extend the time to file a response to the Complaint up to and including March 6, 2017.

DATED: January 30, 2017

SYNGENTA SEEDS, LLC

BY: \_\_\_\_\_

  
John D. Conner, Jr.

Peter L. Gray

Amy Symonds

Counsel for Respondent

Case Name: In the Matter of Syngenta Seeds, LLC  
Case No.: FIFRA-09-2017-0001

### CERTIFICATE OF SERVICE

I certify that the original of the foregoing Motion For Extension Of Time To Respond To  
The Complaint was delivered to Federal Express for overnight delivery to the following:

Regional Hearing Clerk  
U.S. Environmental Protection Agency, Region IX  
75 Hawthorne St.  
San Francisco, CA 94105

that a true and correct copy of the Motion was placed in the United States Mail, addressed to the  
following:

Christina E. Cobb  
Attorney-Advisor  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave. N.W. (MC: 2843)  
Washington, DC 20460

and that a true and correct copy of the Motion was sent via electronic mail to the following:

Cobb.Christina@EPA.gov

Dated: January 30, 2017

  
\_\_\_\_\_  
Peter L. Gray