

requests a two-week extension of time through January 26, 2015 to file its response. This reasonable extension of time will not prejudice Complainant because this proceeding is at an early stage, disclosures have not yet been exchanged, and a hearing date has not been set.

WHEREFORE, for the reasons stated above, Respondent respectfully requests that its request for a two-week extension of time be GRANTED.

Dated: January 7, 2015

/s/ Nicole M. Abbott

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CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of January, 2015, one true and correct copy of the foregoing UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINANT’S MOTION FOR PARTIAL ACCELERATED DECISION ON LIABILITY AND REQUEST FOR EXPEDITED RULING was served on the following via the EPA E-Filing System:

Sybil Anderson, Headquarters Hearing Clerk
Office of Administrative Law Judges
U.S. Environmental Protection Agency
Ronald Reagan Building, Room M1200
1300 Pennsylvania Avenue, NW
Washington, D.C. 20004

I further hereby certify that on this 7th day of January, 2015, one true and correct copy of the foregoing UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINANT’S MOTION FOR PARTIAL ACCELERATED DECISION ON LIABILITY AND REQUEST FOR EXPEDITED RULING was served on the following by electronic mail and Federal Express overnight service:

Margaret J. (Peggy) Livingston
Enforcement Attorney
Office of Enforcement, Compliance and Environmental Justice
U.S. Environmental Protection Agency (8ENF-L)
1595 Wynkoop Street
Denver, CO 80202-1129

/s/ Tamara A. Stires
Tamara A. Stires