

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
BEFORE THE ADMINISTRATOR

In the Matter of:	)	
	)	Docket No. CAA-05-2024-0004
CUTTING EDGE ENTERPRISES, INC.	)	
Forest Lake, Minnesota,	)	JOINT MOTION FOR AN EXTENSION OF
	)	TIME
Respondent.	)	
_____	)	

**JOINT MOTION FOR AN EXTENSION OF TIME**

COMES NOW, the United States Environmental Protection Agency Region 5

("Complainant"), by and through its undersigned counsel and pursuant to 40 C.F.R. § 22.7(b), to respectfully request that this Tribunal grant an extension of time and extend the deadlines set forth in its August 7, 2024 Prehearing Order by an additional 60 days. Complainant has conferred with Respondent and Respondent has agreed to join Complainant in this Motion.

40 C.F.R. Part 22 allows this Tribunal to "grant an extension of time for filing any document: upon timely motion of a party to the proceeding, for good cause shown, and after consideration of prejudice to other parties." 40 C.F.R. § 22.7(b).

For the past month, the parties have been engaged in settlement negotiations and remain hopeful that those negotiations will result in the settlement of this matter. An extension of time will allow the parties additional time to fully engage in settlement negotiations, potentially saving the parties and this Tribunal valuable time and resources. Therefore, the parties believe that a 60-day extension to the deadlines set forth in this Tribunal's Prehearing Order is warranted and serves the interests of all parties. *See e.g., Borla Performance Indus.*, EPA Docket No. CAA-09-2020-0044, 2022 WL 887454, at \*3 (ALJ, March 15, 2022) (Order on

Respondent's Motion to Stay the Proceeding); *Ro Cher Enterprises, Inc., et al.*, EPA Docket No. TSCA-05-2023-0004 (ALJ, June 10, 2024) (Order on Joint Motion for an Extension of Time).

Complainant respectfully requests that the deadlines in this Tribunal's Prehearing Order be extended as follows:

<b>November 20, 2024</b>	Complainant's Initial Prehearing Exchange
<b>December 20, 2024</b>	Respondent's Prehearing Exchange
<b>January 11, 2025</b>	Complainant's Rebuttal Prehearing Exchange <sup>1</sup>

Respectfully submitted,

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<sup>1</sup> Complainant notes that the proposed dates for Respondent's Prehearing Exchange and Complainant's Rebuttal Prehearing Exchange are slightly beyond 60-days to avoid interfering directly with the holiday season. Had Complainant proposed 60 days from the original dates, its rebuttal exchange would have been due on Christmas Day.

In the Matter of *Cutting Edge Enterprises, Inc.*, Respondent  
Docket No. CAA-05-2024-0004

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing **Motion for an Extension of Time**, dated August 30, 2024 was served on the following parties in the manner indicated below.

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Brittani Anderson  
Paralegal Specialist

Copy by OALJ E-Filing System to:

Administrative Law Judge Michael B. Wright  
Mary Angeles, Headquarters Hearing Clerk

<https://yosemite.epa.gov/OA/EAB/EAB-ALJ Upload.nsf/HomePage?ReadForm>

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*Counsel for Respondent*

Dated: August 30, 2024  
Chicago, Illinois