

## Anderson, Sybil

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**Subject:** FW: Filing for Docket No. CAA-HQ-2-15-8065  
**Attachments:** Respondent Taotao USA, Inc.'s Motion for Extension of Time.pdf; Respondents' Motion to Quash and Dismiss.pdf

**From:** John Stone [<mailto:jstone.wmchulaw@gmail.com>]  
**Sent:** Wednesday, December 16, 2015 11:26 AM  
**To:** oaljifiling <[ojifiling@epa.gov](mailto:ojifiling@epa.gov)>  
**Subject:** Filing for Docket No. CAA-HQ-2-15-8065

Ms. Anderson,

Attached to this email are Respondent Taotao USA, Inc.'s Motion for Extension of Time and Respondents,' Taotao Group Co., Ltd., and Jinyun County Xiangyan Industry Co., Ltd., Motion to Quash and Dismiss Pursuant to Federal Rule of Civil Procedure 12(b)(5) and Brief in Support.

Please file these documents into Docket No. CAA-HQ-2015-8065.

The original documents and two copies of each were sent by certified mail, overnight delivery, on December 15, 2015 to:

Headquarters Hearing Clerk  
U.S. Environmental Protection Agency  
Office of Administrative Law Judges  
Mail Code 1900R  
1200 Pennsylvania Ave., N.W.  
Washington, DC 20460

Additionally copies were served upon Robert Klepp and Ed Kulschinsky by certified mail, overnight delivery, on December 15, 2015.

Regards,

John Stone  
The Law Offices of William Chu  
4455 LBJ Freeway #909  
Dallas, Texas 75244  
Tel: (972) 392-9888  
Fax: (972) 392-9889

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C.**

**In the Matter of:**

**Taotao USA, Inc.,  
Taotao Group Co., Ltd., and  
Jinyun County Xiangyuan Industry  
Co., Ltd.,**

**Respondents.**

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**Docket No.  
CAA-HQ-2015-8065**

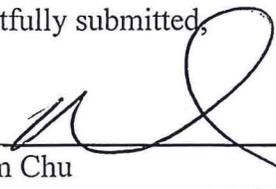
**RESPONDENT TAOTAO USA, INC.'S MOTION FOR EXTENSION OF TIME**

Respectfully, Respondent Taotao USA, Inc. files this Motion for Extension of Time to extend the deadline for filing Respondent's Answer in regard to the above-captioned proceeding.

Respondent requests that the Presiding Officer grant Respondent a 30 day extension to January 16, 2016, to file Respondent's Answer to the Environmental Protection Agency's Administrative Complaint, served on Taotao USA, Inc. on November 16, 2015. The current deadline for filing Respondent's Answer is December 16, 2015. Respondent has not previously requested additional time to respond. Counsel has been called to trial on several matters and is preparing an appellate brief for the 5th Circuit, as well as other matters. Counsel is seeking this extension so that they can adequately prepare Respondent's Answer. Respondent has conferred with counsel for Complainant, and Complainant does not oppose the request to extend the deadline by 30 days.

For the reasons set forth, Respondent respectfully requests that its Motion for Extension of Time to file Respondent's Answer be granted and the Presiding Officer extend the deadline for Respondent to file its Answer to January 16, 2015.

Respectfully submitted,

By:   
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**CERTIFICATE OF CONFERENCE**

Counsel for the Respondent has confirmed that Counsel for Complainant, Ed Kulschinsky, is not opposed to this request for an extension.

  
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William Chu

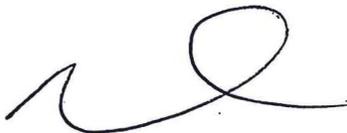
**CERTIFICATE OF SERVICE**

This is to certify that on December 15, 2015 a copy of this document was served by certified mail on Ed Kulschinsky, counsel for Complainant, Robert Klepp, counsel for Complainant, and the Headquarters Hearing Clerk for the EPA Office of Administrative Law Judges, as follows:

Ed Kulschinsky  
Air Enforcement Division  
Office of Civil Enforcement  
Office of Enforcement and Compliance Assurance  
1200 Pennsylvania Ave., NW  
William J. Clinton Federal Building  
Room 1142C, Mail Code 2242A  
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(202) 564-4133  
[Kulschinsky.edward@epa.gov](mailto:Kulschinsky.edward@epa.gov)

Robert G. Klepp  
U.S. EPA, Air Enforcement Division  
1200 Pennsylvania Ave., NW  
Mail Code 2242A  
Washington, DC 20460

Headquarters Hearing Clerk  
U.S. Environmental Protection Agency  
Office of Administrative Law Judges  
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