

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

In the Matter of:)	
)	
Lu Yuan, Inc. and)	
Zhejiang Yongkang Luyuan Industrial)	Docket No. CAA-HQ-2014-7829
& Trading, Co., Ltd.,)	
)	
Respondents)	
)	

UNOPPOSED MOTION FOR EXTENSION OF TIME

Pursuant to Rule 22.7(b) of the Consolidated Rules of Practice, 40 CFR § 22.7(b), the Respondents Lu Yuan, Inc. and Zhejiang Yongkang Luyuan Industrial & Trading, Co., Ltd., by and through their undersigned counsel, hereby move for a 28-day extension of time to file an Answer in the above-captioned matter, and as good cause states as follows:

1. The Complaint in this matter was filed on March 19, 2014 and allegedly received by Respondents on March 24, 2014. Hence, under 40 CFR § 22.15, an Answer would be due in 30 days of service, or by April 23, 2014.
2. The undersigned counsel was retained and authorized to work on the matter by Respondents as of April 7, 2014.
3. The undersigned counsel desires sufficient time to review the files in this case and its current posture. In particular, the undersigned counsel is aware that Respondents and EPA have engaged in settlement discussions for approximately 9 months, and Respondents seek to continue these discussions.
4. Filing an Answer, if necessary, will incur significant time and costs for the Respondents.

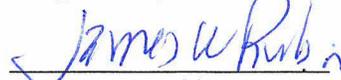
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5. An extension of time to file the Answer will allow the parties to focus primarily on seeking resolution of the matter.
6. The undersigned counsel will also be out of the office on family matters the week of April 14-18, 2014, which will make settlement discussions and additional matters more difficult during this time.
7. Such an extension should not prejudice the EPA; it is the undersigned counsel's current understanding that none of the allegedly unlawfully imported vehicles have entered commerce.
8. This motion is timely filed as an Answer is not due until April 23, 2014.
9. Prior to filing this Unopposed Motion, on April 8, 2014, the undersigned counsel contacted the opposing party as to the extension request, and said opponent indicated that it does not oppose the Motion.
10. By filing this Unopposed Motion, Respondents do not admit liability or waive any of their defenses.

For the reasons stated above, the Respondents hereby move for an extension of time of 28 days to facilitate settlement discussions. An Answer, if necessary, would be due on or by May 21, 2014.

4/10/14
Date

Respectfully submitted,


James W. Rubin
Dentons US LLP
1301 K St., NW
East Tower, Suite 600
Washington, DC 20005
(202) 408-9146

James.rubin@dentons.com

Attorney for Respondents Lu Yuan, Inc. and
Zhejiang Yongkang Luyuan Industrial & Trading,
Co., Ltd

CERTIFICATE OF SERVICE

I certify that the foregoing Unopposed Motion for Extension of Time, dated April 10, 2014, was filed this day by hand delivery with the National Hearing Clerk at the EPA Office of Administrative Law Judges at the address listed below:

Sybil Anderson, National Hearing Clerk
U.S. Environmental Protection Agency
Office of Administrative Law Judges
Ronald Reagan Building, Rm. M1200
1300 Pennsylvania Ave., NW
Washington, DC 20460

I certify that on the date indicated below I sent by U.S. Postal Service and by electronic mail, one copy of the foregoing Unopposed Motion for Extension of Time to the Attorney for Complainant:

David E. Alexander, Attorney Advisor
Air Enforcement Division
Office of Civil Enforcement
Office of Enforcement and Compliance Assurance

1200 Pennsylvania Ave., NW
William J. Clinton South Federal Building
Room 1142C, Mail code 2242A
Washington, DC 20460

Dated: 4/10/14



James W. Rubin
Dentons US LLP
1301 K St., NW
East Tower, Suite 600
Washington, DC 20005
(202) 408-9146
James.rubin@dentons.com