UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C.

In the Matter of:	§	
	§	
Taotao USA, Inc.,	§	
Taotao Group Co., Ltd., and	§	**Docket No.**
Jinyun County Xiangyuan Industry	§	**CAA-HQ-2015-8065**
Co., Ltd.,	§	
	§	
Respondents.	§	

RESPONDENTS' MOTION TO EXTEND TIME FOR FILING RESPONDENTS' ANSWERS

Respectfully, Respondents' Taotao USA, Inc., Taotao Group Co., Ltd., and Jinyun County Xiangyuan Industry Co., Ltd., file this Motion to Extend Time for Filing Respondents' Answers in regard to the above-captioned proceeding.

Pursuant to 40 C.F.R. § 22.7(b), Respondent requests that the deadline for filing Respondents' Answers to the Environmental Protection Agency's Amended Complaint be extended by two-weeks to August 17, 2016. The Amended Complaint was served on Taotao USA, Inc. on July 14, 2016. Respondents' requests this extension because since the filing of the Amended Complaint, Respondents' Counsel has been working on numerous other legal matters. Furthermore, the attorney who was initially assisting in this matter has left our office. Respondents' Counsel is seeking this extension so that they can adequately prepare Respondents' Answers. The requested extension is short and unlikely to prejudice Complainant. Complainant's counsel has been consulted, and does not oppose the request.

For the foregoing reasons, Respondents request that the deadline for filing Respondents' Answers to the Complainant's Amended Complaint be extended to August 17, 2016.

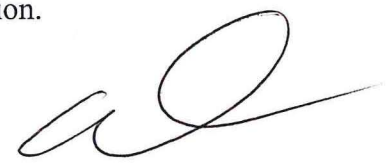
Respectfully Submitted,

08/03/16
Date

William Chu
Texas State Bar No. 04241000
The Law Offices of William Chu
4455 LBJ Freeway, Suite 909
Dallas, Texas 75244
Telephone: (972) 392-9888
Facsimile: (972) 392-9889
wmchulaw@aol.com

CERTIFICATE OF CONFERENCE

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



William Chu

CERTIFICATE OF SERVICE

This is to certify that the Motion to Extend Time for Filing Respondents' Answers in the Matter of Taotao USA, Inc., et al., Docket No. CAA-HQ-2015-8065, was filed and served on the Presiding Officer this day through the Office of Administrative Law Judge's E-Filing System.
I certify that two copies of the foregoing Motion were sent this day by certified mail, return receipt requested, for service on Ed Kulschinsky and Robert Klepp, counsels for Complainant, 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
Washington, DC 20460
(202) 564-4133
Kulschinsky.edward@epa.gov

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

08/03/16
Date

William Chu
Texas State Bar No. 04241000
The Law Offices of William Chu
4455 LBJ Freeway, Suite 909
Dallas, Texas 75244
Telephone: (972) 392-9888
Facsimile: (972) 392-9889
wmchulaw@aol.com