

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY REGION 4

IN THE MATTER OF

Great Lakes Dredge & Dock Company, LLC

Docket No. MPRSA-04-2019-7500

Respondent.

Proceeding Pursuant to § 105(a) of the Marine
Protection, Research and Sanctuaries Act,
33 U.S.C. § 1415(a)

Joint Motion for Stay to Facilitate Settlement

Complainant, Director, Enforcement and Compliance Division of the U.S. Environmental Protection Agency Region 4, and Respondent Great Lakes Dredge & Dock Co., LLC, by and through undersigned counsel, hereby jointly request a stay of hearing-related deadlines to facilitate settlement. The parties have reached a settlement in principle that, subject to agreement on all terms in a written agreement, will resolve this matter completely. The parties need additional time to finalize the settlement. So that the parties can avoid diverting attention to litigation-related deadlines, they jointly ask that the tribunal issue an order staying all deadlines and directing the parties to submit a status report in 45 days if the case is not settled before that time.

Dated: May 4, 2021

Respectfully Submitted,

/s/ Tyler Sniff

Tyler J. Sniff
Michael Creswell
Attorney-Advisers
Office of Regional Counsel, Region 4
U.S. ENVIRONMENTAL PROTECTION AGENCY
61 Forsyth Street, SW, 9T25
Atlanta, Georgia 30303
Telephone: (404) 562-9499
Email: sniff.tyler@epa.gov

/s/ Neal McAliley

T. Neal McAliley (Florida Bar No. 172091)
Email: nmcAliley@carltonfields.com
CARLTON FIELDS, P.A.
100 S.E. Second Street, Suite 4200
Miami, Florida 33131-2113
Telephone: (305) 530-0050

Counsel for Respondent

Creswell.michael@epa.gov

Counsel for Complainant

CERTIFICATE OF SERVICE

I hereby certify that a copy of this document was sent by email on this date to Tyler Sniff, Office of Regional Counsel, U.S. Environmental Protection Agency, Region4, 61 Forsyth St., SW, Atlanta, Georgia 30303.

/s/ Neal McAliley