

**UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
BEFORE THE ADMINISTRATOR**

In the Matter of:	)	
	)	
The Geo Group, Inc.,	)	Docket No. FIFRA-09-2024-0066
	)	
Respondent.	)	

FOURTH MOTION FOR EXTENSION OF TIME

Pursuant to 40 C.F.R. Section 22.16(a), Complainant files this fourth motion for extension of time to respond to Respondent’s Motion to Dismiss that was filed and served on November 25, 2024. Section 22.16(b) provides that a party’s response to any written motion must be filed within 15 days after service of such motion. Section 22.16(b) also provides that the Presiding Officer may set a longer time for response and Section 22.17(b) provides that the Presiding Officer may 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 the other parties, or upon its own initiative.

In the present case, Complainant’s response to the Motion to Dismiss is currently due on March 25, 2025 after the Presiding Officer’s granting of Complainant third motion for extension of time on February 6, 2025. Complainant’s previous motions for extension of time were requested, in part, to allow the parties to complete the Alternative Dispute Resolution (“ADR”) process. Although the pending ADR process is scheduled to conclude on March 21, 2025, at this juncture, it appears unlikely that the ADR process will result in settlement of this case. Consequently, Complainant now files the present motion for extension of time not based on settlement efforts but on the change in administration. As the Presiding Officer is aware, a new

federal government administration took office on January 20, 2025. Due to this change in administration, Complainant needs time to brief new Agency officials about this case and the underlying statute. An extension of time to respond to the Motion to Dismiss would allow Complainant to fully brief incoming administration officials before the response is due. Complainant anticipates that it will need an additional 60 days for such briefing to occur. Requests to continue proceedings to allow time for new administration officials to become familiar with cases under their authority are customary. See Brady Campaign to Prevent Gun Violence v. Salazar, 612 F.Supp.2d 1, 10 (D.D.C. 2009) noting that an extension of a preliminary injunction briefing schedule was granted after a change in administration. Thus, Complainant requests a 60-day extension of time to respond to the Motion to Dismiss to facilitate this internal briefing.

As directed by the Presiding Officer's Prehearing Order, Complainant has informed Respondent about the motion and Respondent does not oppose it. Accordingly, Complainant requests that this motion be granted.

Respectfully submitted,

3/14/2025  
Date

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**CERTIFICATE OF SERVICE**

I certify that an electronic copy of the foregoing Fourth Motion for Extension of Time *In the Matter of The Geo Group, Inc.*, Docket No. FIFRA-09-2024-0066, was filed and served on the Presiding Officer this day through the Office of Administrative Law Judge's E-Filing System. I certify that an electronic copy of this Motion for Extension of Time was sent this day by e-mail to the following e-mail address for service on Respondent: Gregory M. Munson, Esq. at gmunson@gunster.com.

3/14/2025  
Date

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