UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX 75 HAWTHORNE STREET SAN FRANCISCO, CALIFORNIA 94105

			15 JULY 2020
In the Matter of:)		U.S. EPA - REGION IX
)		
Borla Performance Industries, Inc.,)		
)	Docket No. CAA-R9-2020-0044	
Respondent.)		
)		

** FILED **

UNCONTESTED MOTION TO EXTEND TIME TO ANSWER COMPLAINT

Respondent, through undersigned counsel, hereby moves to extend the time for filing the Answer to the Complaint by 30 days, to and including August 31, 2020. The Complaint in this case was delivered to prior counsel in this action on July 2, 2020, per the proof of service filed on July 11, 2020 by counsel for Complainant. The Answer thus would be due on August 1, 2020. Undersigned counsel, however, was recently engaged and substituted for prior counsel to defend against this Complaint and has yet to take possession of the underlying files from prior counsel. The transfer of those files is expected to be completed with diligence, and counsel needs additional time to review those files and prepare the Answer.

Counsel for Complainant, Mr. Zabel, has stated that the Complainant does not oppose this motion for additional time. Accordingly, the time to file an Answer should be extended by 30 days, with the Answer being due on or before August 31, 2020.

Respectfully submitted,

Erik S. Jaffe

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Date: 7/15/2020

CERTIFICATE OF SERVICE

I, Erik S. Jaffe, hereby certify that I have served, by electronic mail, a true and correct copy of the foregoing document, to the following counsel for Complainant:

Allan Zabel Attorney-Advisor United States Environmental Protection Agency, Region 9, Office of Regional Counsel zabel.allan@epa.gov

Erik S. Jaffe

Dated: July 15th, 2020.