

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
BEFORE THE ADMINISTRATOR

In the Matter of:

Timothy Wilson, d/b/a
Wilson's Pest Control,

Respondent.

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Docket No. FIFRA-07-2023-0135

**RESPONDENT'S MOTION FOR LEAVE TO FILE INITIAL POST-HEARING BRIEF
OUT OF TIME**

Now comes Respondent Timothy Wilson, d/b/a Wilson's Pest Control, by and through his undersigned counsel, and moves for leave to file his Initial Post-Hearing Brief out of time. In support of this motion Respondent states as follows.

1. Pursuant to Respondent's Motion For an Extension of Time to File his Initial Post-Hearing Brief, the deadline for filing Respondent's Post-Hearing Brief was extended by seventeen (17) days from -- June 13, 2025 to June 30, 2025. The motion was based on Respondent's counsel's expectation that this would allow him sufficient time to complete the Initial Post-Hearing Brief.

2. However, notwithstanding diligent effort to meet the June 30 deadline, working on the brief at all times reasonably available to counsel, given the time required on other cases and matters that included court appearances and other appointments, counsel was not able to meet that deadline, and there was just cause for the delay.

3. Respondent's Initial Post-Hearing Brief has now been completed.

4. Due consideration of Respondent's Initial Post-Hearing Brief is important for a fair and just adjudication of this case, and to avoid prejudice to Respondent. Further, it will serve the interests of justice.

5. Complainant will not suffer undue prejudice by the granting of this motion.
6. To avoid further delay, Complainant's position regarding this motion has not been ascertained.

WHEREFORE, for the reasons stated above, Respondent requests the granting of leave to file his Initial Post-Hearing Brief, and that the schedule for additional post-hearing submissions be extended accordingly.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Melvin L. Raymond", is written over a horizontal line.

Melvin L. Raymond
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St. Louis, MO 63108
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Attorney for Respondent

Date: July 5, 2025

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion was sent this day to the following parties in the manner indicated below.

Copy by OLALJ E-filing System to:
U.S. Environmental Protection Agency
Office of Administrative Law Judges

Copy by Electronic Mail to:
Adam Hilbert
Assistant Regional Attorney
U.S. Environmental Protection Agency
Region 7
11201 Renner Blvd.
Lenexa, KS 66209
Email: hilbert.adam@epa.gov

Date: July 5, 2025


Melvin L. Raymond
Attorney for Respondent