

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C.

In the Matter of:

Taotao USA, Inc.,
Taotao Group Co., Ltd., and
Jinyun County Xiangyuan Industry
Co., Ltd.,

Respondents.

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Docket No.
CAA-HQ-2015-8065

RESPONDENT TAOTAO USA, INC.'S MOTION FOR EXTENSION OF TIME

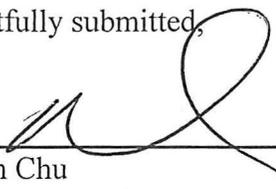
Respectfully, Respondent Taotao USA, Inc. files this Motion for Extension of Time to extend the deadline for filing Respondent's Answer in regard to the above-captioned proceeding.

Respondent requests that the Presiding Officer grant Respondent a 30 day extension to January 16, 2016, to file Respondent's Answer to the Environmental Protection Agency's Administrative Complaint, served on Taotao USA, Inc. on November 16, 2015. The current deadline for filing Respondent's Answer is December 16, 2015. Respondent has not previously requested additional time to respond. Counsel has been called to trial on several matters and is preparing an appellate brief for the 5th Circuit, as well as other matters. Counsel is seeking this extension so that they can adequately prepare Respondent's Answer. Respondent has conferred with counsel for Complainant, and Complainant does not oppose the request to extend the deadline by 30 days.

For the reasons set forth, Respondent respectfully requests that its Motion for Extension of Time to file Respondent's Answer be granted and the Presiding Officer extend the deadline for Respondent to file its Answer to January 16, 2015.

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Respectfully submitted,

By: 

William Chu

Texas State Bar No. 04241000

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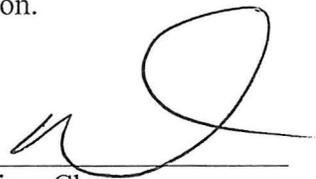
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CERTIFICATE OF CONFERENCE

Counsel for the Respondent has confirmed 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 on December 15, 2015 a copy of this document was served by certified mail on Ed Kulschinsky, counsel for Complainant, Robert Klepp, counsel for Complainant, and the Headquarters Hearing Clerk for the EPA Office of Administrative Law Judges, as follows:

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