

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1**

In the Matter of:)	
)	
ISP Freetown Fine Chemicals, Inc.)	Docket No. RCRA-01-2018-0062
238 South Main Street)	
Assonet, MA 02702-1699)	
)	
MAR000009605)	
)	
Proceeding under Section 3008(a))	
of the Resource Conservation and)	
Recovery Act, 42 U.S.C. § 6928(a))	
_____)	

**COMPLAINANT’S UNOPPOSED MOTION TO EXTEND THE TIME FOR FILING
REPLY BRIEF IN SUPPORT OF MOTION TO STRIKE**

Pursuant to Rule 22.7(b) of the Consolidated Rules of Practice, 40 C.F.R. § 22.7(b), Complainant EPA hereby requests an extension of time to September 30, 2019, to file a reply in support of Complainant’s Motion to Strike the Third and Sixteenth Defenses from Respondent’s Answer. Respondent’s brief in opposition to Complainant’s motion was filed on August 23, 2019, and Complainant’s reply is due on September 3, 2019. *See* Order on Respondent’s Motion for Extension of Time (July 30, 2019) (“Order”).

As grounds therefor, Complainant states as follows:

1. Respondent’s Joint Reply in Support of Motion to Dismiss and Opposition to Motion to Strike was filed on August 23, 2019. Complainant is considering whether to file a reply.
2. Complainant’s reply brief in support of Complainant’s motion to strike is due to be filed on September 3, 2019.
3. The undersigned attorney for Complainant will be on vacation from September 3,

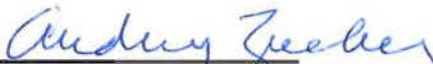
2019 through September 13, 2019.

4. Due to counsel's vacation, Complainant needs additional time to determine whether to submit a reply brief and to prepare the brief for filing.

Based on the foregoing, Complainant requests an extension of time to September 30, 2019, to file its reply in support of Complainant's Motion to Strike.

Respondent's counsel has indicated that Respondent assents to this motion for extension of time.

Respectfully submitted,


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Dated: August 29, 2019

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Complainant's Unopposed Motion to Extend the Time For Filing Reply Brief in Support of Motion to Strike was served this 29th day of August, 2019 in the following matter on the parties listed below:

By OALJ E-Filing System:

Mary Angeles, Headquarters Hearing Clerk
U.S. Environmental Protection Agency
Office of Administrative Law Judges
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

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Dated: August 29, 2019