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## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## **REGION 8**

IN THE MATTER OF:	)	Docket No. RCRA-08-2020-0007
New Prime, Inc.	)	RESPONDENT'S UNOPPOSED
	)	MOTION TO EXTEND TIME TO FILE
Respondent.	)	POST HEARING BRIEFS
	)	
	)	

Respondent respectfully requests an extension of time of two weeks to file its Post

Hearing Brief, which is due on January 20, 2023. The reason for this request for an extension of
time is an unexpected time commitment to deal with the undersigned's mother's end-of-life
needs. The undersigned has been spending extended periods of time in Texas to deal with his 92year-old mother's health needs after a fall in December 2022. The undersigned discussed this
motion with Complainant's counsel, and they have graciously agreed to not oppose the motion.

If granted, Respondent's Post Hearing Brief would be due on February 3, 2023, EPA's

Reply brief would be moved to February 17, 2023, and Respondent's final reply brief would be

RESPONDENT'S UNOPPOSED MOTION

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due on March 3, 2023.

## RESPECTFULLY SUBMITTED this 11th day of January 2023.

MARK RYAN LAW PLLC

/s/ Mark A. Ryan

Mark A. Ryan WSBA No. 18279

Scott McKay NEVIN, BENJAMIN & McKAY LLP

Attorneys for Respondent New Prime, Inc.

## **CERTIFICATE OF SERVICE**

I hereby certify that on the 11th day of January 2023, I filed Respondent's Unopposed Motion to Extend Time via the OALJ E-filing system and via email to:

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/s/ Mark Ryan	
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