

Mark Ryan
MARK RYAN LAW PLLC
P.O. Box 306
Winthrop, WA 98862
Telephone: (509) 557-5447
mryanboise@msn.com

Scott McKay
NEVIN, BENJAMIN & McKAY LLP
P.O. Box 2772
Boise, ID 83701
Telephone: (208) 343-1000
Facsimile: (208) 345-8274
smckay@nbmlaw.com

Attorneys for Respondent New Prime, Inc.

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 92-year-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
TO EXTEND TIME

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.

