

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 3**

In the Matter of:)	Docket No. RCRA-03-2013-0039
)	
Aylin, Inc., Rt. 58 Food Mart, Inc.,)	
Franklin Eagle Mart Corp., and)	
Adnan Kiriscioglu, d/b/a New Jersey)	
Petroleum Organization)	
)	
)	
Respondents.)	
)	
)	

**COMPLAINANT'S MOTION TO COMPEL DISCOVERY
AND IMPOSE SANCTIONS**

In accordance with 40 C.F.R. §§ 22.16(a), 22.19(e) and 22.19(g) of the *Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits*, Complainant, the Director of the Land and Chemicals Division of the United States Environmental Protection Agency, Region III, submits this Motion to Compel Discovery and Impose Sanctions, and Complainant hereby requests this Court to compel Respondents to comply with the March 12, 2014 Discovery Order, and if necessary, to impose sanctions against Respondents for their failure to comply with this Court's Discovery Order. Counsel for Complainant has contacted counsel for Respondents who indicated his intention to object to the granting of this Motion.

Accompanying this Motion to Compel Discovery and Impose Sanctions is Complainant's Memorandum of Law in support of its Motion to Compel Discovery and Impose Sanctions.

WHEREFORE, Complainant requests that this Court issue an Order granting Complainant's Motion to Compel Discovery and Impose Sanctions, including an Order granting Complainant's relief requested herein.

Respectfully Submitted,

8/21/2014
Date

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8/29/2014
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