

UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 6

In the Matter of:	§	Docket Nos.	CWA-06-2012-2710
	§		CWA-06-2012-2712
Paco Swain Realty, L.L.C.	§		
	§		
Respondent.	§		

**MOTION FOR EXTENSION OF FILING DEADLINE**

COMES NOW COMPLAINANT, the Director of the Water Quality Protection Division, United States Environmental Protection Agency, Region 6, by and through its attorney, submits the following Motion for Extension of Filing Deadline in each of the above-captioned matters.

1. The Administrative Law Judge (“ALJ”) issued the Order Scheduling Hearing on October 22, 2014. The Order set a deadline of December 19, 2014 for Complainant and Paco Swain Realty, LLC (“Respondent”) (collectively, the “Parties”) to file a Joint Set of Stipulated Facts, Exhibits and Testimony (“Stipulations”).

2. Respondent’s attorney, Robert W. Morgan, contacted Complainant via email on the evening of December 17, 2014 stating that he had experienced a death in his family with a funeral set for December 18, 2014. The redacted version of the email is attached as Attachment A.

3. Complainant believes that the litigation would benefit from comprehensive, well thought out Stipulations, and, given the events described herein and the current deadline, Complainant believes it is in the benefit of all parties to extend the filing deadline to permit thorough negotiation on the Stipulations.

4. Complainant requests that the ALJ extend the filing deadline for the Stipulations to December 24, 2014. Respondent supports this extension.

RESPECTFULLY SUBMITTED,

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Tucker Henson  
Enforcement Counsel (6RC-EW)  
U.S. EPA, Region 6  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733  
Tel.: (214) 665-8148  
Fax: (214) 665-3177

**CERTIFICATE OF SERVICE**

I certify that the original of the foregoing MOTION FOR EXTENSION OF FILING DEADLINE was filed electronically with the **Headquarters Hearing Clerk** of the Office of the Administrative Law Judges (“OALJ”) via the OALJ E-Filing System, and a true and correct copy was sent to the following on this 18st day of December, 2014, via email to:

Robert W. Morgan  
Attorney at Law  
212 North Range Avenue  
Denham Springs, LA 70726  
*morganlaw@bellsouth.net*

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Tucker Henson