

UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY

RECEIVED BY OALJ  
2013 AUG 26 P11 4: 08

In the Matter of: )  
)  
)  
*Geason Enterprises, L.L.C.,* )  
*GE Ventures, L.P., Hammerhead* )  
*Off-Road, Inc., TJ Power Sports L.L.C.,* )  
*Shanghai Howhit Machinery Manufacture* )  
*Co. Ltd., and Shanghai Tong Jian Sports* )  
*Equipment Co., Ltd.* )

Docket No.  
CAA-HQ-2013-8050

**MOTION FOR EXTENSION OF TIME  
TO ANSWER COMPLAINT AND REQUEST HEARING**

NOW COMES, Geason Enterprises, L.L.C., GE Ventures, L.P., Hammerhead Off-Road, Inc., and TJ Power Sports L.L.C., (“Hammerhead Respondents”) by and through their counsel, Bracewell & Giuliani LLP, and file this motion for an extension of time to answer the complaint and request a hearing, pursuant to 40 CFR § 22.7(b). In support of this motion, the Hammerhead Respondents aver as follows:

1. The Hammerhead Respondents received the Complaint and Notice of Opportunity to Request a Hearing (the “Complaint”) in the above matter from the United States Environmental Protection Agency (the “Complainant”) on July 30, 2013.
2. The Complaint sets forth eleven counts for alleged violations of the Clean Air Act, 42 U.S.C. §§ 7521-7554, and the regulations promulgated under the Clean Air Act.
3. The Complaint does not include a specific penalty demand; however, it sets forth the maximum civil penalty of not more than \$32,500 or \$37,500 for each alleged violation.
4. Pursuant to 40 CFR § 22.7(c) and 40 CFR § 22.15(a), the Hammerhead Respondents have until August 30, 2013 to file a written answer to the Complaint and to request a hearing.

5. The Complaint contains serious allegations that require substantial investigation by the Hammerhead Respondents.

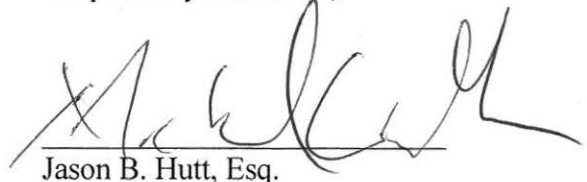
6. In light of the serious allegations that require substantial investigation, the Hammerhead Respondents respectfully request a 30-day extension, until September 30, 2013, to file a written answer and to request a hearing.

7. Pursuant to 40 CFR § 22.7(b), this motion is filed sufficiently in advance of the due date for a written answer and request for a hearing. Prior to filing this Motion, the undersigned contacted the Complainant as to the extension requested herein and said Complainant indicated that it does not oppose the Motion.

8. Pursuant to 40 CFR § 22.5(c)(4), the undersigned is authorized to accept service in this matter.

WHEREFORE, the Hammerhead Respondents request the Presiding Officer extend the Hammerhead Respondents' deadline to file a written answer and to request a hearing to September 30, 2013.

Respectfully submitted,



Jason B. Hutt, Esq.  
Michael Weller, Esq.  
Bracewell & Giuliani LLP  
2000 K St NW, Suite 500  
Washington, DC 20006  
(202) 828-5850  
Fax: (800) 404-3970  
[jason.hutt@bgllp.com](mailto:jason.hutt@bgllp.com)

Counsel to Geason Enterprises L.L.C.,  
GE Ventures, L.P., Hammerhead  
Off-Road, Inc., and TJ Power  
Sports L.L.C.

DATE: August 26, 2013

UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY

In the Matter of: )

)  
)  
)  
*Geason Enterprises, L.L.C.,* )  
*GE Ventures, L.P., Hammerhead* )  
*Off-Road, Inc., TJ Power Sports L.L.C.,* )  
*Shanghai Howhit Machinery Manufacture* )  
*Co. Ltd., and Shanghai Tong Jian Sports* )  
*Equipment Co., Ltd.* )

Docket No.  
CAA-HQ-2013-8050

CERTIFICATE OF SERVICE

Pursuant to 40 CFR § 22.5(a)(3), I hereby certify that a true and correct original and two copies of this Motion for Extension of Time to Answer Complaint and Request Hearing were served upon the following individuals via courier.

U.S. Environmental Protection Agency  
Office of the Hearing Clerk  
Office of Administrative Law Judges  
Ronald Regan Building, Rm. M1200  
1300 Pennsylvania Ave., N.W.  
Washington, DC 20004

Pursuant to 40 CFR § 22.5(a)(3), I hereby certify that one a true and correct copy of this Motion for Extension of Time to Answer Complaint and Request Hearing were served upon the following individuals via overnight mail and e-mail.

Meetu Kaul  
U.S. EPA, Air Enforcement Division  
1200 Pennsylvania Ave., NW  
William Jefferson Clinton Building South, Room 3151A  
Washington, DC 20004  
Email: [kaul.meetu@epa.gov](mailto:kaul.meetu@epa.gov)

  
Jason B. Hutt, Esq.  
Michael Weller, Esq.  
Bracewell & Giuliani LLP  
2000 K St NW, Suite 500  
Washington, DC 20006  
(202) 828-5850  
Fax: (800) 404-3970  
[jason.hutt@bgllp.com](mailto:jason.hutt@bgllp.com)

DATE: August 26, 2013