

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY REGION 4

IN THE MATTER OF

Great Lakes Dredge & Dock Company, LLC

Docket No. MPRSA-04-2019-7500

Respondent.

Proceeding Pursuant to § 105(a) of the Marine
Protection, Research and Sanctuaries Act,
33 U.S.C. § 1415(a)

**JOINT MOTION FOR EXTENSION OF DEADLINES
RELATED TO EPA'S MOTION FOR PARTIAL ACCELERATED DECISION**

Respondent Great Lakes Dredge & Dock Company, LLC ("Great Lakes") and Complainant EPA hereby request an extension of time for the parties to file memoranda in connection with EPA's Motion for Partial Accelerated Decision as to Liability ("Motion").

On October 16, 2020, EPA filed the Motion, which seeks to adjudicate the liability issues in the case. Given the substantive nature of the Motion, changes in the attorney team working on the case for Great Lakes, and deadlines in other litigation matters, counsel for Great Lakes respectfully requests an extension of time to file its memorandum in opposition to the Motion from November 2 to November 12, 2020. For the same reasons and the Thanksgiving holiday, the parties also request that Complainant's deadline to file its reply in support of the Motion be extended from November 12 to December 9, 2020. This request for extension is made in good faith, and not for purposes of delay.

In accordance with the Court's Prehearing Order, Great Lakes has contacted counsel for the EPA Region 4 who joins in this reciprocal request for an extension time. Therefore, the Parties respectfully request that the Presiding Officer issue an Order granting an extension of time as set forth in this Motion.

Dated: October 27, 2020

Respectfully Submitted,

/s/ Neal McAiley

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CERTIFICATE OF SERVICE

I hereby certify that a copy of this document was sent by overnight delivery on this date to Tyler Sniff, Office of Regional Counsel, U.S. Environmental Protection Agency, Region 4, 61 Forsyth St., SW, Atlanta, Georgia 30303.

/s/ Neal McAiley _____