JAMES BRUCE MCMATH SAMUEL E. LEDBETTER WILL BOND NEIL CHAMBERLIN CHARLES D. HARRISON CARTER C. STEIN ROSS NOLAND



711 WEST THIRD STREET LITTLE ROCK, AR 72201 501-396-5400 FAX: 501-374-5118 www.ncmathlaw.com

MART VEHIK, OF COUNSEL PHILLIP H. McMATH, OF COUNSEL

SAMUEL E. LEDBETTER Direct No. (501) 396-5405 sam@memathlaw.com

SIDNEY S. McMATH (1912-2003) LELAND LEATHERMAN (1915-2006) HENRY WOODS (1918-2002) WINSLOW DRUMMOND (1933-2005) SARAH K. STANLEY Parategal 501-396-5410 sarah@memathlaw.com

December 18, 2014

Lorena Vaughn Regional Hearing Clerk U.S. Environmental Protection Agency 1445 Ross Avenue Dallas, Texas 75202

Re: Ludwig, Inc. Waldo, Arkansas; EPCRA-06-2015-0502

Dear Ms. Vaughn:

Enclosed are three copies of the *Motion for Extension of Time to Respond* regarding the above-mentioned matter. Please file the Motion and return the additional copies in the self-addressed, stamped envelope provided.

Thank you for your cooperation in this matter. Please contact us with any questions.

Sincerely,

Sarah K. Stanley
Sarah K. Stanley

sks

Enc.

cc: Brian Tomasovic

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY FILED REGION 6 2814 DEC 22 PM 2: 57 DALLAS, TEXAS

REGIC DAT HEALTHO CLERK

IN THE MATTER OF:

LUDWIG, INC. WALDO, ARKANSAS DOCKET NO. EPCRA-06-2015-0502

RESPONDENT

MOTION FOR EXTENSION OF TIME TO RESPOND

Respondent Ludwig, Inc. states the following for its Motion for Extension of Time:

- Complainant Environmental Protection Agency filed a Complaint and Notice of Opportunity for Hearing in this docket on November 26, 2014.
- Complainant perfected service on December 9, 2014, resulting in a January 8,
 due date for an answer by respondent.
- 3. Counsel for respondent conferred with counsel for complainant prior to filing this motion to determine complainant does not contest an extension of time until February 9, 2015, for respondent to file an answer.
- 4. Respondent affirmatively states it intends to propose a settlement agreement to complainant, but requires additional time to do so.
- 5. For these reasons, respondent requests an order pursuant to 40 C.F.R. § 22.7(b) extending the time for respondent to file an answer to February 9, 2015.

WHEREFORE, respondent requests that the Judicial Officer grant this Motion for Extension of Time to Respond, and for all other relief to which it may be entitled.

Respectfully submitted,

By:

Ross Noland, Ark. Bar No. 06334 McMath Woods P.A. 711 W. Third Street Little Rock, AR 72201 Tel. 501-396-5400 ross@mcmathlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on December 18, 2014, I served copy of this document via US and electronic mail to:

Brian Tomasovic Office of Regional Counsel (6RC-ER) U.S. Environmental Protection Agency, Region 6 1445 Ross Ave., Suite 1200 Tomasovic.brian@epa.gov

Ross Noland