UNITED STATES ENVIRONMENTAL PROTECTION AGENCY BEFORE THE ADMINISTRATOR

In the Matter of:)	
)	
Taotao USA, Inc.,)	Docket No. CAA-HQ-2015-8065
Taotao Group Co., Ltd., and)	
Jinyun County Xiangyuan Industry Co., Ltd.	Ď	
7 (7.8))	
Respondents.)	

MOTION TO EXTEND PREHEARING EXCHANGE DEADLINE

The Tribunal's "Order on Motion for Leave to Amend the Complaint and to Extend Prehearing Deadlines," issued July 5, 2016, established the following deadlines for filing prehearing exchanges:

August 26, 2016	Complainant's Initial Prehearing Exchange
September 9, 2016	Respondents' Prehearing Exchange(s)
September 16, 2016	Complainant's Rebuttal Prehearing Exchange

Pursuant to 40 C.F.R. § 22.7(b), Complainant requests that the deadline for filing Complainant's Rebuttal Prehearing Exchange be extended by two weeks to Friday, September 30, 2016. Complainant makes this request because the undersigned counsel for Complainant will be traveling internationally from September 1, 2016, through September 16, 2016, and will consequently be unable to review Respondents' Prehearing Exchange or prepare a Rebuttal Prehearing Exchange within the existing schedule. The requested extension is short and unlikely to prejudice Respondents. Respondents' counsel has been consulted, and does not oppose the request.

For these reasons, Complainant requests that the deadline for filing Complainant's Rebuttal Prehearing Exchange be extended to September 30, 2016.

Respectfully Submitted,

Date/

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CERTIFICATE OF SERVICE

I certify that the Motion to Extend Prehearing Exchange Deadline in the Matter of Taotao USA, Inc., et al., Docket No. CAA-HQ-2015-8065, was filed and served on the Presiding Officer this day through the Office of Administrative Law Judge's E-Filing System.

I certify that three copies of the foregoing Motion were sent this day by certified mail, return receipt requested, for service on Respondents' counsel at the address listed below:

William Chu, Esq. The Law Offices of William Chu 4455 LBJ Freeway, Suite 909 Dallas, TX 75244

Ag 1, 2016

Edward Kulschinsky, Attorney Adviser

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