

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

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IN THE MATTER OF:)
)
TNT GENERAL CONTRACTING, INC.,)
WEBB MINERALS, LLC, and)
TRUSTEE(S) of the Gary and Carol)
Trump Trust (U/T/A),)
)
Respondents.)
)
Proceeding under Section 7003 of the)
Resource Conservation and Recovery Act)
As amended, 42 U.S.C. Section 6928 (a))
and (g) and Section 309(a) of the Clean)
Water Act, 33 U.S.C. § 1319 (a))

Docket No. RCRA-07-2012-0020
CWA-07-2012-0029

MOTION FOR EXTENSION OF TIME, WITH CONSENT OF PETITIONER

COMES NOW Respondent Webb Minerals, LLC (“Webb Minerals”), by and through undersigned counsel, and respectfully requests a 2-week extension of time in which to respond to the Complaint in this matter. In support of this request, Webb Minerals states as follows:

1. Webb Minerals has been served with a Complaint in the above-captioned matter.
2. Webb Minerals was formerly represented by Attorney Talmadge G. Brenner with regard to discussions and negotiations prior to the institution of litigation.
3. Following the institution of litigation, Talmadge G. Brenner, notified Webb Minerals that he believed it was in Webb Minerals’ best interest to obtain counsel more familiar with litigation of this type.
4. Webb Minerals has recently retained the undersigned counsel to represent it in the above-captioned matter. Webb Minerals’ new counsel is working diligently to review and analyze Petitioner’s claims and Webb Minerals’ defenses to those claims, and in good faith

requests a short 2-week extension of time to be able to complete such review and analysis prior to responding to Petitioner's Complaint.

5. Belinda Holmes, Esq., counsel for Petitioner, has informed the undersigned that the Petitioner has no objection to the granting of this request.

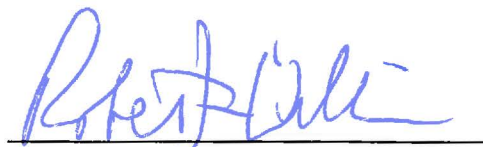
WHEREFORE, the Respondent Webb Minerals, LLC hereby request an extension of time to file a responsible pleading to August 29, 2012.

Dated: August 9, 2012

Respectfully submitted,

HUSCH BLACKWELL LLP

By:



Robert F. Wilkinson

Ron Hobbs

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St. Louis, MO 63105

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(314) 480-1505 FAX

CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of August, 2012, the original and one true and correct copy of the foregoing document was sent by Fed-Ex to the Regional Hearing Clerk, U.S. Environmental Protection Agency, Region 7, 901 N. 5th Street, Kanas City, Kansas 66101, and was sent by regular mail to the following counsel:

Ms. Belinda L. Holmes
Senior Counsel
U.S. EPA, Region 7
901 North 5th Street
Kansas City, KA 66101

Mr. David A. Shorr
Lathrop & Gage, LLP
314 E. High Street
Jefferson City, MO 65101

