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.)	
)	
Respondents.)	

MOTION TO EXTEND PREHEARING EXCHANGE DEADLINE FOR DISPOSITIVE MOTIONS

The Tribunal's Prehearing Order dated May 11, 2016, established that any dispositive motion would be due within thirty (30) days of the due date for Complainant's Rebuttal Prehearing Exchange. In an order dated September 12, 2016, the Tribunal set a due date of October 14, 2016, for Complainant's Rebuttal Prehearing Exchange, making November 14, 2016, the due date for any dispositive motion. Complainant filed its Rebuttal Prehearing Exchange on October 13, 2016. On October 28, 2016, two weeks after the due date for Complainant's Rebuttal Prehearing Exchange, Respondents served Complainant with a revised Joint Prehearing Exchange.

Pursuant to 40 C.F.R. § 22.7(b), Complainant requests that the due date for filing any dispositive motion be extended by two weeks to Monday, November 28, 2016. Complainant makes this request because it requires the additional time to evaluate whether a dispositive motion is appropriate in light of Respondents' revised Joint Prehearing Exchange and to prepare any such motion. The requested extension will not cause undue delay because it is short and because no hearing date has been set in this matter. The extension will not cause Respondents undue prejudice. Respondents' counsel has been consulted, and does not oppose the request.

For these reasons, Complainant requests that the due date for filing any dispositive motion be extended to November 28, 2016.

Respectfully Submitted,

Live Submitted,

Edward Kulschinsky, Attorney Adviser

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CERTIFICATE OF SERVICE

I certify that the Motion to Extend Prehearing Exchange Deadline for Dispositive Motions 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 the foregoing Motion were electronically served on Respondents' counsel via e-mail at the address listed below:

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<u>__11/8/2016</u>___

Date

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