

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY REGION IX
75 HAWTHORNE STREET
SAN FRANCISCO, CALIFORNIA 94105

**** FILED ****
17 AUG 2020
U.S. EPA - REGION IX

In the Matter of:)
)
Borla Performance Industries, Inc.,)
) Docket No. CAA-09-2020-0044
Respondent.)
_____)

UNCONTESTED MOTION TO EXTEND TIME TO ANSWER
AMENDED COMPLAINT

Respondent, through undersigned counsel, hereby moves to extend the time for filing the Answer to the Amended Complaint by 32 days, to and including Monday, September 28, 2020. Counsel received an electronic copy of the Amended Complaint on August 6, 2020, and a hard copy on August 13, 2020. The Answer is currently due on August 27, 2020, a date earlier than the due date of an extension motion previously granted to respond to the original Complaint. As stated in that motion, undersigned counsel was recently engaged and substituted for prior counsel to defend against this action. As of this filing counsel has just received access to the files in this case from prior counsel and is in the process of reviewing those files and conferring with prior counsel as to their contents and organization. Counsel thus continues to need additional time to review them and prepare the Answer.

Counsel for Complainant, Mr. Zabel, has stated that the Complainant does not oppose this motion for additional time. Accordingly, the time to file an Answer should be extended by 32 days, with the Answer being due on or before Monday, September 28, 2020.

Respectfully submitted,

A handwritten signature in black ink, reading "Erik S. Jaffe", written over a horizontal line.

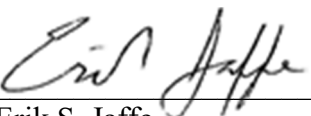
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Date: August 17, 2020

CERTIFICATE OF SERVICE

I, Erik S. Jaffe, hereby certify that I have served, by electronic mail, a true and correct copy of the foregoing document, to the following counsel for Complainant:

Allan Zabel
Attorney-Advisor
United States Environmental Protection Agency, Region 9, Office of Regional Counsel
zabel.allan@epa.gov


Erik S. Jaffe

Dated: August 17, 2020