

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 7  
11201 RENNER BOULEVARD  
LENEXA, KANSAS 66219

IN THE MATTER OF:	)	
	)	Docket No.
Tom Villegas and Amy Villegas,	)	CWA-07-2022-0104
	)	
Respondents,	)	MOTION TO EXTEND
	)	RESPONDENTS'
Proceedings under Section 309(a)(3) of the	)	PREHEARING
Clean Water Act, 33 U.S.C. § 1319(a)(3).	)	EXCHANGE DEADLINE
<hr/>	)	

COME NOW Respondents, Tom Villegas and Amy Villegas, and move this Tribunal to extend Respondents' Prehearing Exchange Deadline by one hundred twenty (120) days. In support of this motion, Respondents state as follows:

1. A Complaint and Notice of Opportunity for Hearing ("Complaint") was filed in this matter on August 2, 2022.
2. This Tribunal issued a Prehearing Order directing Respondents to file their Prehearing Exchange by November 11, 2022.
3. On November 14, 2022, this Tribunal issued an Order extending Respondents' Prehearing Exchange deadline to December 16, 2022.
4. Since that Order, Mattson Ricketts Law Firm withdrew as Respondents' counsel, and Respondents hired the undersigned as their counsel.
5. The undersigned have entered an appearance of even date herewith, on behalf of Respondents.
6. Respondents and their new counsel need additional time to coordinate expert witnesses, review privileged documents, and prepare a Prehearing Exchange.

7. In light of the foregoing good cause shown, Respondents request that the Prehearing Exchange deadline be extended by one hundred twenty (120) days.

8. Respondents are amenable to also extending the Agency's deadline for filing a Rebuttal Prehearing Exchange by one hundred twenty (120) days.

9. No prejudice will result to any party from granting the requested extension.

WHEREFORE, Respondents respectfully request an extension of their Prehearing Exchange deadline by one hundred twenty (120) days.

Dated this 14<sup>th</sup> day of December, 2022.

TOM VILLEGAS AND AMY VILLEGAS,  
Respondents

By: /s/Vanessa A. Silke

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Motion to Extend Respondents' Prehearing Exchange Deadline, dated December 14, 2022, was sent this day to the following parties in the manner indicated below:

Original by OALJ E-Filing System to:

Mary Angeles, Headquarters Hearing Clerk  
U.S. Environmental Protection Agency  
Office of Administrative Law Judges  
[https://yosemite.epa.gov/OA/EAB/EAB-ALJ\\_Upload.nsf](https://yosemite.epa.gov/OA/EAB/EAB-ALJ_Upload.nsf)

Copy by Electronic Mail to:

Natasha Goss, Attorney-Advisor  
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/s/Vanessa A. Silke