

**UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

BEFORE THE ADMINISTRATOR

In the Matter of:)	
)	
Detroit Renovations, LLC, and Nicole Curtis)	Docket No. TSCA-HQ-2018-5006
)	
Respondents.)	

JOINT MOTION FOR SECOND EXTENSION OF TIME

The Court's Order on the parties' Joint Motion for Extension of Time dated March 26, 2019: requires that "if the case is settled, a fully-executed Consent Agreement and Final Order shall be filed with the Clerk of the Environmental Appeals Board no later than May 17, 2019..." The Order also states that "[I]f a fully-executed Consent Agreement and Final Order is not filed ... the parties must prepare for hearing and shall strictly comply with the following prehearing requirements of this Order." The Order also states that Complainant's Initial Prehearing Exchange is due on May 17, 2019.

Following up on Complainant's Status Report filed on March 14th, the parties held a settlement conference on March 8th and a subsequent settlement discussion on March 20th. During the March 20th discussion, the parties made substantial progress toward settlement. The parties have since exchanged offers and spoke on multiple occasions further discussing settlement options. During the negotiation period afforded by the Court's Order, Respondent participated in various charitable endeavors and as a result the parties were unable to coordinate as many negotiation discussions as anticipated. As a result, in order to provide time for the parties to engage in further negotiations in an earnest effort to agree upon a settlement, both parties jointly request for good cause pursuant to Rule 22.7(b) of the Consolidated Rules of

Practice (40 C.F.R. § 22.7(b)) that the Consent Agreement Final Order and Initial Prehearing Exchange due dates be extended thirty days, from May 17, 2019 until June 17, 2019, with other deadlines being extended accordingly.

This Joint Motion for Extension of Time is made in good faith and is not intended to unduly delay this matter.

Respectfully Submitted,

May 10, 2019
Date

Counsel for Complainant:
/s _____

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May 9, 2019
Date

Pro Se Respondent:

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CERTIFICATE OF SERVICE

I hereby certify that the original JOINT MOTION FOR SECOND EXTENSION OF TIME, Docket No. TSCA-HQ-2018-5006 has been submitted electronically using the OALJ E-Filing System.

A copy was sent by email and postal mail to:

Nicole Curtis, Registered Agent
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Date

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