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



IN THE MATTER OF

LHP, LLC 130 N. 27<sup>TH</sup> Street, #6 Lincoln, Nebraska

Respondent

Docket No. TSCA-07-2014-0029

NECEIVED BY DALJ 2015 DEC 16 MM 10: 53

## LHP, LLC'S UNOPPOSED MOTION FOR EXTENSION OF TIME

NOW COMES, Respondent LHP, LLC, by and through its attorneys, Delaney Law, P.C.,

and pursuant to § 22.7 of the Consolidated Rules of Practice request the Honorable

Administrative Law Judge extend all deadlines and hearings an additional sixty (60) days. In

support thereof Respondent states as follows.

- 1. Over the last ten days the parties have reinitiated settlement discussions in this matter.
- Pursuant to said settlement discussions the EPA searching its records for additional documents to provide to Respondent.
- Pursuant to said settlement discussions the Respondent is drafting proposed language to add to the proposed settlement agreement.
- The parties require additional time to locate, exchange and review the anticipated additional documentation that will be provided by the EPA and to draft an agreed settlement order.

5. The EPA has reviewed this motion and does not object to extending all deadlines and hearings an additional sixty (60) days.

WHEREFORE, Respondent, LHP, LLC, respectfully requests the Honorable

Administrative Law Judge extend all deadlines and hearings for sixty (60) days and any other

relief this Court deems just and equitable.

Respectfully Submitted, By: An Attorney for LHP, LLC

DELANEY LAW, PC Attorney No. 44350 444 N. Wabash Ave, Ste 300 Chicago, Illinois 606011 (312) 276-0263

## CERTIFICATE OF SERVICE

Cynthia M Rote certifies that she caused one original and one copy of Unopposed Motion for Extension of Time to be served upon the Office of Administrative Law Judges (address below) and one copy to be served upon Complainant (address below) on December 15, 2015.

Sybil Anderson, Headquarters Hearing Clerk Office of Administrative Law Judges U.S. Environmental Protection Agency Ronald Reagan Building, Room M1200 1300 Pennsylvania Avenue, NW Washington, DC 20004

Robert W. Richards, Attorney U.S. Environmental Protection Agency 11201 Renner Boulevard Lenexa, Kansas 66219

Delaney Law 444 N Wabash Ave., 3rd Floor Chicago, Illinois 60611 (312) 276-0263