## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## BEFORE THE ADMINISTRATOR

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

## **JOINT MOTION FOR EXTENSION OF TIME**

The Prehearing Order dated February 19, 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 April 2, 2019..." The Order also states that "if 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 April 2, 2019.

Following up on Complainant's Status Report filed on March 14<sup>th</sup>, the parties held an initial settlement conference on March 8<sup>th</sup> and a subsequent settlement discussion on March 20<sup>th</sup>. During the March 20<sup>th</sup> discussion, the parties made substantial progress toward settlement. The parties discussed the necessity to exchange and review extensive paperwork to facilitate negotiations. As a result, in order to provide time to engage in 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 forty-five days, from April 2, 2019 until May 16, 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,

Counsel for Complainant:

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Mark Seltzer, Attorney Advisor

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Pro Se Respondent:

March 22, 2019

Date

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## **CERTIFICATE OF SERVICE**

I hereby certify that the original JOINT MOTION FOR 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 1350 Lagoon Ave Suite 900 Minneapolis MN, 55408 assistant@nicolecurtis.com

Date

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