## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY BEFORE THE ADMINISTRATOR

In the Matter of:	
The Geo Group, Inc.,	
	Respondent.

Docket No. FIFRA-09-2024-0066

## **MOTION FOR EXTENSION OF TIME**

Pursuant to 40 C.F.R. Section 22.16(a), Complainant files this motion for extension of time to respond to Respondent's Motion to Dismiss that was filed and served on November 25, 2024. Section 22.16(b) provides that a party's response to any written motion must be filed within 15 days after service of such motion. Section 22.16(b) also provides that the Presiding Officer may set a longer time for response and Section 22.17(b) provides that the Presiding Officer may grant an extension of time for filing any document upon timely motion of a party to the proceeding, for good cause shown and after consideration of prejudice to the other parties, or upon its own initiative.

In the present case, Complainant's response to the Motion to Dismiss is currently due on December 10, 2024. In drafting its response, Complainant needs to consult and coordinate with the Office of Enforcement and Compliance Assurance and the Office of General Counsel in EPA Headquarters but was unable to begin such consultation and coordination until its return from the Thanksgiving holiday on December 2, 2024. In addition, the parties' joint motion for ADR was granted and the parties are scheduled to meet for their initial ADR session on December 19, 2024. The ADR proess is scheduled to be completed on January 13, 2025. Consequently, Complainant requests that Complainant's response to the Motion to Dismiss become due no later than January 14, 2025 to allow the ADR process, which the parties jointly requested, to play out and to allow necessary consultation and coordination with EPA Headquarters given the upcoming holidays. Complainant believes that the extension is warranted and will serve the interests of the parties. As directed by the Presiding Officer's Prehearing Order, Complainant has informed Respondent about the motion and Respondent does not oppose the motion. Accordingly, Complainant requests that this motion be granted.

Respectfully submitted,

<u>12/3/2024</u> Date

Carol Bussey Assistant Regional Counsel Office of Regional Counsel EPA Region 9 75 Hawthorne Street (ORC-2) San Francisco, CA 94105 415-972-3950 bussey.carol@epa.gov Counsel for Complainant

## **CERTIFICATE OF SERVICE**

I certify that an electronic copy of the foregoing Motion for Extension of Time *In the Matter of The Geo Group, Inc*, Docket No. FIFRA-09-2024-0066, was filed and served on the Presiding Officer this day through the Office of Administrative Law Judge's E-Filing System. I certify that an electronic copy of this Motion for Extension of Time was sent this day by e-mail to the following e-mail address for service on Respondent: Gregory M. Munson, Esq. at gmunson@gunster.com.

<u>12/3/2024</u> Date

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