

FILED

APR 24 2012

John Ruby, Executive Secretary
Environmental Quality Council

**BEFORE THE ENVIRONMENTAL QUALITY COUNCIL
STATE OF WYOMING**

In the Matter of the Appeal of the Notice)
of Violation and Order Issued to:) Docket No. 11-5213A
RAM Trucking, Inc.)
P.O. Box 20382)

JOINT MOTION FOR CONTINUANCE AND REQUEST FOR STAY

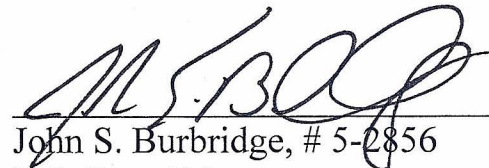
RAM Trucking, Inc. (RAM) and the Wyoming Department of Environmental Quality, Solid & Hazardous Waste Division (DEQ), the only Parties to the above captioned matter, by and through their undersigned counsel, hereby jointly move to continue and request stay of the hearing on RAM's appeal of Notice of Violation and Order No. 4899-11 issued by the Department of Environmental Quality (DEQ), which is currently scheduled for May 11, 2012. As grounds for this motion, RAM and DEQ represent that they have had three meetings and exchanged several draft documents in the process of negotiating settlement of the above captioned matter through stipulated modification of the contested Order, that settlement of the matter appears likely, but additional time to concentrate on working out remaining details without concurrently preparing for the imminent hearing will facilitate the process.

WHEREFORE, the Parties jointly move the EQC to:

1. Vacate the pre-hearing memorandum due April 26, 2012, the pre-hearing conference scheduled for May 1, 2012, and the final hearing scheduled for May 11, 2012, and stay further proceedings in this case until the EQC's regular meeting on July 12-13, 2012; and
2. Grant the Parties a continuance until the EQC's regular meeting scheduled for July 12-13, 2012 to file either a joint stipulation for modification of the contested order and dismissal of this appeal or a proposed revised schedule for bringing this case to hearing.

RESPECTFULLY SUBMITTED this 24th day of April, 2012.

FOR RAM TRUCKING, INC.:



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FOR THE DEPARTMENT OF ENVIRONMENTAL QUALITY:



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