

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ABINGDON DIVISION**

THE CITY OF BRISTOL, TENNESSEE,)
)
 Plaintiff,)
)
 v.)
)
 THE CITY OF BRISTOL, VIRGINIA,)
)
 Defendant.)
)
)

Case No.: 1:22-cv-00023-JPJ

MOTION TO EXTEND DEADLINES IN PRELIMINARY INJUNCTION

Bristol, VA respectfully moves to modify two deadlines set forth in the stipulated Preliminary Injunction, entered June 14, 2022. While Bristol, VA is expending significant efforts on the remediation recommended by the expert panel convened by the Virginia Department of Environmental Quality (DEQ), the city has encountered hurdles (delays caused by weather, COVID-19, nonresponsive bidding, and supply chain disruptions) with 2 deadlines set forth in the Preliminary Injunction that make it impracticable to meet the previously agreed-upon dates. Bristol, VA sought the consent of Bristol, TN to amend the Preliminary Injunction and Bristol TN has asked to visit the Landfill and to receive supporting documentation before making a determination. The parties are currently working to set the site visit, but because of the exigent circumstances and fast-approaching deadlines, Bristol VA seeks the Court’s consideration. The rationale and grounds for this request, are set forth in an accompanying brief.

Dated: August 19, 2022

Respectfully submitted,

THE CITY OF BRISTOL, VIRGINIA

/s/ Erin B. Ashwell

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CERTIFICATE OF SERVICE

I hereby certify that on August 19, 2022, I caused the foregoing to be filed with the Clerk of the U.S. District Court for the Western District of Virginia using the Court's CM/ECF system, which will electronically serve copies of the same on counsel for all parties.

/s/ Erin B. Ashwell

Erin B. Ashwell

Counsel for Defendant The City of Bristol, Virginia