

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

Docket No. 535 — 835 Norwich Worcester Turnpike, Woodstock, CT

**INTERVENOR'S MOTION TO CONTINUE / RESET HEARING DATE (GOOD
CAUSE)**

Date: September 04, 2025

Intervenor CT4RTPM respectfully moves to continue the September 9, 2025 evidentiary hearing for good cause and to reset it to a short later date. This request is narrowly tailored and is not intended to delay the proceeding; the Council's final decision is currently scheduled for on or about March 2, 2026.

Good cause consists of the following:

- 1) **ADA accommodation pending.** Intervenor has requested a reasonable modification under ADA Title II (28 C.F.R. §§ 35.130(b)(7), 35.160) regarding the paper-copy requirement and is arranging professional printing/courier service. Allowing a brief continuance will avoid disability-based exclusion and ensure full participation.
- 2) **Outstanding discovery.** Intervenor served targeted, non-duplicative add-on interrogatories keyed to Applicant Attachment 1. A brief continuance will allow responses and avoid the need to keep the record open solely to receive them.
- 3) **Administrative fairness.** Intervenor recently obtained party/intervenor status and timely filed comprehensive PDFs. A short continuance (7–14 days) will allow production of clean bound sets consistent with the Council's recyclable-paper guidance without prejudice to any party.

Requested relief (any of the following would be acceptable):

- Reset the evidentiary hearing to a date during the week of September 23, 2025 (or any date thereafter convenient to the Council); or
- Convert September 9 to a brief status/scheduling conference (accept exhibits by reference) and set the evidentiary portion for a later date; or
- In the alternative, proceed on September 9 but keep the record open for at least 30 days to accept discovery responses and supplemental exhibits.

Intervenor will of course comply with any date the Council selects and will serve all parties promptly. This motion is made respectfully to promote a complete and accessible record without prejudice to any participant.

Respectfully submitted,

Paska Nayden

Founder CT4RTPMA/Intervenor

Docket No. 535