

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

PEOPLE OF THE STATE OF ILLINOIS,	)	
	)	
Complainant,	)	
	)	
v.	)	PCB 21-039
	)	(Enforcement - Land)
BUENING IMPLEMENT, INC.,	)	
an Illinois corporation,	)	
	)	
Respondent.	)	

**NOTICE OF FILING**

TO: Don Brown	Carol Webb
Clerk of the Board	Hearing Officer
Illinois Pollution Control Board	Illinois Pollution Control Board
James R. Thompson Center	1021 North Grand Avenue East
100 West Randolph, Suite 11-500	Post Office Box 19274
Chicago, Illinois 60601	Springfield, Illinois 62794-9276
<b>(VIA ELECTRONIC MAIL)</b>	<b>(VIA ELECTRONIC MAIL)</b>

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Illinois Pollution Control Board an **ENTRY OF APPEARANCE OF JENNIFER M. MARTIN, AND JOINT MOTION FOR EXTENSION OF TIME TO ANSWER COMPLAINT**, copies of which are herewith served upon you.

Respectfully submitted,

Buening Implement, Inc.  
Respondent

DATE: January 22, 2021

By:     /s/ Jennifer M. Martin      
One of Its Attorneys

Jennifer M. Martin  
HEPLERBROOM, LLC  
4340 Acer Grove Drive  
Springfield, IL 62711  
[Jennifer.Martin@heplerbroom.com](mailto:Jennifer.Martin@heplerbroom.com)  
(217) 528-3674



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	)	
Respondent.	)	

**ENTRY OF APPEARANCE OF JENNIFER M. MARTIN**

NOW COMES Jennifer M. Martin, of the law firm HEPLERBROOM, LLC, and hereby enters her appearance in this matter on behalf of Respondent, BUENING IMPLEMENT, INC.

Respectfully submitted,

DATE: January 22, 2021

By:           /s/ Jennifer M. Martin            
Jennifer M. Martin

Jennifer M. Martin  
HeplerBroom LLC  
4340 Acer Grove Drive  
Springfield, Illinois 62711  
Phone: (217) 528-3674  
Fax: (217) 528-3964  
[Jennifer.martin@heplerbroom.com](mailto:Jennifer.martin@heplerbroom.com)

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Respondent.	)	

**JOINT MOTION FOR EXTENSION OF TIME TO ANSWER COMPLAINT**

BUENING IMPLEMENT, INC. (“Buening” or “Respondent”), and THE PEOPLE OF THE STATE OF ILLINOIS (“Complainant”), by and through their respective attorneys, hereby file this Joint Motion for Extension of Time to File an Answer to the Complaint. In support of this Joint Motion, Buening and Complainant state as follows:

1. On November 23, 2020, Complainant filed its Complaint with the Illinois Pollution Control Board (“Board”), naming Buening Implement, Inc. as a Respondent.
2. The date of service of the Complaint on Respondent is unknown because there is no date of delivery indicated on the certified mail receipt.
3. Buening has engaged in settlement discussions with the Complainant in an effort to resolve this matter. Buening requests until February 12, 2021, to file its Answer to allow the parties to continue settlement discussion and attempt to reach a resolution in this matter.
4. Counsel for Buening and the Complainant have conferred regarding the deadline to file an answer to the Complaint, and Complainant has agreed to an extension of time to February 12, 2021, for Buening to file an Answer in this matter.

5. Therefore, Buening and the Complainant jointly request an extension of time to file an Answer to the Complaint until February 12, 2021.

6. Granting of this Joint Motion will not result in prejudice to any party or participant.

WHEREFORE, for the above and foregoing reasons BUENING IMPLEMENT, INC., and THE STATE OF ILLINOIS request that the Illinois Pollution Control Board enter an Order granting this Joint Motion for Extension of Time to File an Answer to the Complaint, extending the deadline for BUENING IMPLEMENT, INC. to file its Answer to the Complaint until February 12, 2021.

Respectfully submitted,

BUENING IMPLEMENT, INC.,  
Respondent,

PEOPLE OF THE STATE OF ILLINOIS  
KWAME RAOUL, Attorney General of the  
State of Illinois, Complainant

By: /s/ Jennifer M. Martin  
Jennifer M. Martin

By: /s/ Raymond J. Callery  
Raymond J. Callery

Jennifer M. Martin  
HeplerBroom LLC  
4340 Acer Grove Drive  
Springfield, Illinois 62711  
Phone: (217) 528-3674  
Fax: (217) 528-3964  
[Jennifer.martin@heplerbroom.com](mailto:Jennifer.martin@heplerbroom.com)

Raymond J. Callery  
Assistant Attorney General  
500 South Second Street  
Springfield, Illinois 62701  
(217) 782-9031  
[rcallery@atg.state.il.us](mailto:rcallery@atg.state.il.us)  
[ebs@atg.state.il.us](mailto:ebs@atg.state.il.us)

Date: January 22, 2021