

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS)	
)	
Complainant,)	
)	
v.)	PCB 17-19
)	(Enforcement – Water)
CRANBROOK FARMS, LLC, an Illinois)	
limited liability company,)	
)	
Respondent.)	

NOTICE OF FILING

TO: Mr. Don Brown	Brad Halloran, Esq.
Clerk of the Board	Hearing Officer
Illinois Pollution Control Board	Illinois Pollution Control Board
100 West Randolph Street	1021 North Grand Avenue East
Suite 11-500	Post Office Box 19274
Chicago, Illinois 60601	Springfield, Illinois 62794-9274
(VIA ELECTRONIC MAIL)	(VIA ELECTRONIC MAIL)

(SEE PERSONS ON ATTACHED SERVICE LIST)

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Illinois Pollution Control Board the **ENTRY OF APPEARANCE OF JENNIFER M. MARTIN, and RESPONDENT CRANBROOK FARMS, LLC'S MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO THE COMPLAINANT'S COMPLAINT FOR INJUNCTIVE AND OTHER RELIEF**, a copy of which is hereby served upon you.

Respectfully submitted,
HEPLERBROOM, LLC,

Dated: January 18, 2017

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

Jennifer M. Martin
HEPLERBROOM, LLC
4340 Acer Grove Drive
Springfield, Illinois 62711
(217) 528-3674
Jennifer.Martin@heplerbroom.com
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CERTIFICATE OF SERVICE

I, Jennifer M. Martin, the undersigned, certify that I have served the attached **ENTRY OF APPEARANCE OF JENNIFER M. MARTIN, and RESPONDENT CRANBROOK FARMS, LLC'S MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO THE COMPLAINANT'S COMPLAINT FOR INJUNCTIVE AND OTHER RELIEF** upon:

Mr. Don Brown
Clerk of the Board
Illinois Pollution Control Board
100 West Randolph Street
Suite 11-500
Chicago, Illinois 60601

Rachel Medina
Assistant Attorney General
500 South Second Street
Springfield, Illinois 62706
RMedina@atg.state.il.us
ebs@atg.state.il.us

via electronic mail on January 18, 2017.

/s/ Jennifer M. Martin
Jennifer M. Martin

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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, CRANBROOK FARMS, LLC.

Respectfully submitted,

DATE: January 18, 2017

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

Jennifer M. Martin
HEPLERBROOM, LLC
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RESPONDENT CRANBROOK FARMS, LLC'S MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO COMPLAINANT'S COMPLAINT FOR INJUNCTIVE AND OTHER RELIEF

NOW COMES Respondent, CRANBROOK FARMS, LLC (“Respondent” or “Cranbrook Farms”), by and through its attorneys, HEPLERBROOM, LLC, and hereby moves the Illinois Pollution Control Board (“Board”) or assigned hearing officer pursuant to 35 Ill. Admin. Code § 101.522 and Illinois Supreme Court Rule 183, to enter an Order granting the Respondent, an extension of time until March 20, 2017, in which to file its Answer or other responsive pleading in the instant matter. In support of its Motion, Respondent states as follows:

1. On November 22, 2016, the State filed its Complaint for Injunctive and Other Relief.
2. The current deadline for Cranbrook Farms to file an answer is January 20, 2017.
3. Counsel for Cranbrook Farms has been in contact with counsel for the State regarding settlement discussions. The undersigned and Cranbrook Farms would like to devote available resources to focusing on settlement discussions with the State.

4. The undersigned has conferred with counsel for the State and requested the State's agreement to extend the date for Cranbrook Farms to file an Answer. Counsel for the State agrees to the extension of 60 days to allow the parties to diligently pursue settlement.

5. No material prejudice or harm will be caused to any other party if the Board does grant the request of Cranbrook Farms for an extension of time to answer or otherwise respond to the Complaint.

WHEREFORE, for the reasons stated above, Respondent Cranbrook Farms, LLC, requests the Hearing Officer or Board to enter an Order granting its Motion for an extension of time until March 20, 2017, in which to file its Answer or otherwise respond to the State's Complaint.

Respectfully submitted,

CRANBROOK FARMS, LLC
Respondent,

Dated: January 18, 2017

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

Jennifer M. Martin
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