

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

PRAIRIE RIVERS NETWORK,	)	
	)	
Complainant,	)	
	)	
v.	)	PCB 2019-093
	)	(Enforcement - Water)
DYNEGY MIDWEST GENERATION, LLC,	)	
	)	
Respondent.	)	
	)	

**NOTICE OF ELECTRONIC FILING**

To: Attached Service List

PLEASE TAKE NOTICE that on May 6, 2019, I electronically filed with the Clerk of the Illinois Pollution Control Board (“Board”) the attached COMPLAINANT’S MOTION FOR EXTENSION OF TIME TO RESPOND TO RESPONDENT’S MOTION TO STAY OR DISMISS, copies of which are served on you along with this notice.

Dated: May 6, 2019

Respectfully Submitted,

/s/ Jennifer Cassel  
Jennifer Cassel (IL Bar No. 6296047)  
Earthjustice  
1010 Lake Street, Ste. 200  
Oak Park, IL 60301  
(215) 717-4525 (phone)  
(212) 918-1556 (fax)  
jcassel@earthjustice.org

*Counsel for Complainant Prairie Rivers Network*

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Complainant,	)	
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DYNEGY MIDWEST GENERATION, LLC,	)	
	)	
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**COMPLAINANT’S MOTION FOR EXTENSION OF TIME TO RESPOND TO  
RESPONDENT’S MOTION TO STAY OR DISMISS**

Pursuant to Board Rules 101.500(d) and 101.522, Complainant Prairie Rivers Network (“PRN”), by and through its counsel, respectfully requests that the Illinois Pollution Control Board (“Board”) enter an order extending the time to respond to Respondent Dynegy Midwest Generation, LLC’s (“Dynegy”) Motion to Stay or Dismiss until June 5, 2019. In support of this request, PRN states as follows:

1. Dynegy filed its Motion to Stay or Dismiss on May 1, 2019.
2. Board Rule 101.500(d) provides that responses to motions are due within 14 days after the motion is filed. Fourteen days after May 1, 2019 is May 15, 2019.
3. Pursuant to Board Rules 101.500(d) and 101.522, a party may request that the Board grant additional time to respond to a motion. 35 Ill. Adm. Code 101.500(d) & 101.522.
4. PRN seeks a modest extension of that deadline to allow adequate time to review the multiple, dispositive issues raised by the Motion to Stay or Dismiss and provide an appropriate response. In addition, PRN’s undersigned counsel are representing clients in several other matters with deadlines in May, and also have pre-existing plans to travel during the week

of May 13 to attend an organizational meeting in Washington, D.C.. Accordingly, we request until June 5, 2019, to submit the motion response.

5. There are currently no further deadlines or dates scheduled in this proceeding, so an extension for filing the response does not prejudice any party.

6. Counsel for the parties have conferred, and counsel for Dynegy represents that it does not oppose this extension request.

WHEREFORE, PRN respectfully requests an extension of time allowing it until June 5, 2019, to respond to Dynegy's Motion to Stay or Dismiss.

Respectfully submitted the 6th of May, 2019.

/s/ Jennifer Cassel  
Jennifer Cassel (IL Bar No. 6296047)  
Earthjustice  
1010 Lake Street, Ste. 200  
Oak Park, IL 60301  
(215) 717-4525 (phone)  
(212) 918-1556 (fax)  
jcassel@earthjustice.org

Thomas Cmar (IL Bar No. 6298307)  
Earthjustice  
1010 Lake Street, Ste. 200  
Oak Park, IL 60301  
(312) 257-9338 (phone)  
(212) 918-1556 (fax)  
tcmar@earthjustice.org

Mychal Ozaeta  
Earthjustice  
1617 John F. Kennedy Blvd., Suite 1130  
Philadelphia, PA 19103  
(215) 717-4529 (phone)  
(212) 918-1556 (fax)  
mozaeta@earthjustice.org

*Counsel for Complainant Prairie Rivers Network*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 6th day of May, 2019, I electronically served the foregoing Complainant's Motion for Extension of Time to Respond to Respondent's Motion to Stay or Dismiss upon the parties of record at the email addresses indicated in the service list below.

I further certify that my email address is [jcassel@earthjustice.org](mailto:jcassel@earthjustice.org); the number of pages in the email transmission is 5; and the email transmission took place today before 5:00 p.m. CT.

Respectfully Submitted,

/s/ Jennifer Cassel  
Jennifer Cassel (IL Bar No. 6296047)  
Earthjustice  
1010 Lake Street, Ste. 200  
Oak Park, IL 60301  
(215) 717-4525 (phone)  
(212) 918-1556 (fax)  
[jcassel@earthjustice.org](mailto:jcassel@earthjustice.org)

*Counsel for Complainant Prairie Rivers Network*

**SERVICE LIST**

Daniel John Deeb  
SCHIFF HARDIN LLP  
233 South Wacker Dr., Suite 7100  
Chicago, Illinois 60606  
(312) 258-5532  
[ddeeb@schiffhardin.com](mailto:ddeeb@schiffhardin.com)

P. Stephen Gidiere III  
BALCH & BINGHAM LLP  
1901 Sixth Avenue North, Suite 1500  
Birmingham, AL 35203-4642  
(205) 226-8735  
[sgidiere@balch.com](mailto:sgidiere@balch.com)

Caitlin M. Ajax  
SCHIFF HARDIN LLP  
233 South Wacker Drive, Suite 7100  
Chicago, Illinois 60606  
(312) 258-5591  
[cajax@schiffhardin.com](mailto:cajax@schiffhardin.com)

Michael L. Raiff  
GIBSON, DUNN & CRUTCHER LLP  
2100 McKinney Avenue, Suite 1100  
Dallas, TX 75201-6912  
(214) 698-3350  
[mraiff@gibsondunn.com](mailto:mraiff@gibsondunn.com)

Joshua R. More  
SCHIFF HARDIN LLP  
233 South Wacker Dr., Ste. 7100  
Chicago, Illinois 60606  
(312) 258-5769  
[jmore@schiffhardin.com](mailto:jmore@schiffhardin.com)

Don Brown, Clerk of the Board  
Illinois Pollution Control Board  
James R. Thompson Center  
Suite 11-500  
100 West Randolph  
Chicago, Illinois 60601

Ryan C. Granholm  
SCHIFF HARDIN LLP  
233 South Wacker Dr., Ste. 7100  
Chicago, Illinois 60606  
(312) 258-5633  
[rgranholm@schiffhardin.com](mailto:rgranholm@schiffhardin.com)

[don.brown@illinois.gov](mailto:don.brown@illinois.gov)