

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

SIERRA CLUB)	
)	
Complainant,)	
)	
v.)	
)	
ILLINOIS POWER GENERATING)	PCB 19-078
COMPANY; ILLINOIS POWER)	(Enforcement – Water)
RESOURCES GENERATING, LLC;)	
ELECTRIC ENERGY, INC.; and VISTRA)	
ENERGY CORP.)	
)	
Respondents.)	

NOTICE OF FILING

To:

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

Faith E. Bugel
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Bradley P. Halloran, Hearing Officer
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PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Pollution Control Board a **Joint Motion for Extension of Time to File**, copies of which are hereby served upon you.

/s/ Ryan C. Granholm

Ryan C. Granholm

Dated: October 30, 2019

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Attorneys for Respondents

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

SIERRA CLUB)	
)	
Complainant,)	
)	
v.)	
)	PCB No. 19-78
ILLINOIS POWER GENERATING)	(Enforcement – Water)
COMPANY, ILLINOIS POWER)	
RESOURCES GENERATING, LLC,)	
ELECTRIC ENERGY, INC., and VISTRA)	
ENERGY CORP.)	
)	
Respondents.)	

Joint Motion for Extension of Time to File

1. By written order dated October 17, 2019, the Hearing Officer directed the parties to file a proposed joint discovery schedule for the liability phase by October 30, 2019.

2. Attorneys for Sierra Club and Respondents (collectively, the “Parties”) conferred by telephone on October 22, 2019. After exchanging proposed schedules via email, the attorneys for the Parties conferred via phone again on October 30, 2019. While the Parties have not yet reached agreement, they have discussed a proposed compromise discovery schedule.

3. In the interest of attempting to avoid filing competing proposals, the Parties have agreed to jointly move for a two-day extension of time to file their proposed discovery schedules until Friday, November 1, 2019.

WHEREFORE, the Parties respectfully request that the Hearing Officer extend their deadline to file a proposed discovery schedule until November 1, 2019.

Electronic Filing: Received, Clerk's Office 10/30/2019

Dated: October 30, 2019

/s/ Daniel J. Deeb
Daniel J. Deeb

/s/ Gregory E. Wannier
Gregory E. Wannier

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CERTIFICATE OF SERVICE

I, the undersigned, certify that on this 30th day of October, 2019, I have served electronically the attached **Joint Motion for Extension of Time to File**, upon the following persons by e-mail at the email addresses indicated below:

Bradley P. Halloran, Hearing Officer
Illinois Pollution Control Board
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I further certify that my email address is rgranholm@schiffhardin.com; the number of pages in the email transmission is 6; and the email transmission took place today before 5:00 p.m.

/s/ Ryan C. Granholm
Ryan C. Granholm

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