

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

PEOPLE OF THE STATE OF ILLINOIS,	)	
	)	
Complainant,	)	
	)	
v.	)	PCB 20-13
	)	(Enforcement – Air)
ERICKSON STEEL COMP., INC., an	)	
Illinois Corporation,	)	
	)	
Respondent.	)	

**REQUEST FOR SIXTY DAY EXTENSION TO ANSWER THE COMPLAINT**

NOW COMES the Respondent, Erickson Steel Company, Inc. (“Erickson Steel”), by and through their attorneys, KNELL LAW, L.L.C., and, pursuant to Section 101.522 of the Illinois Pollution Control Board rules, respectfully requests that the Hearing Officer provide Erickson Steel a sixty day extension to file their answer to the complaint in the above captioned matter. In support of its Motion, Erickson Steel states as follows:

1. An Order was entered by the Hearing Officer on November 4, 2019, setting a deadline of January 6, 2020, for Erickson Steel to answer the complaint.
2. On December 30, 2019, Erickson Steel and People of the State of Illinois reached an agreement to resolve this claim.
3. Since an agreement has been reached between the parties, there is no longer a need for Erickson Steel to answer the complaint.
4. The telephone status conference with the Hearing Officer is scheduled for January 8, 2020, at 11:00 A.M.
5. The parties intend to advise the Hearing Officer of the agreement and present a joint stipulation/agreement to the Hearing Officer for approval shortly thereafter.
6. The People of the State of Illinois have advised Erickson Steel that they have no objection to a sixty day extension.
7. This extension is being requested in order to allow the parties to finalize the agreement and present said agreement/stipulation to the Hearing Officer for approval.

**WHEREFORE**, for the reasons set forth above, Erickson Steel respectfully requests that the Board grant a sixty day extension for Erickson Steel to file its answer to the complaint.

Respectfully Submitted,  
Erickson Steel Company, Inc.

By:  \_\_\_\_\_

Ilir Imeri  
One of its attorneys

Ilir Imeri, Esq.  
ARDC #: 6306223  
KNELL LAW, L.L.C.  
504 Fayette St.  
Peoria, IL 61603  
P: (309) 655-1530  
F: (309) 655-1535  
E: [iimeri@knelllaw.com](mailto:iimeri@knelllaw.com)

**PROOF OF SERVICE**

The undersigned certifies that on 12-31-19 a copy of forgoing documents were filed and served on all counsel of record at their respective addresses by the identified method:

- E-File
- Deposit in the U. S. Mail
- Hand Delivery
- Fax
- Overnight Delivery

**TO:** Emma L. Hudspath  
Office of the Attorney General  
500 South Second Street  
Springfield, IL 62706

Carol Webb  
Hearing Officer  
Illinois Pollution Control Board  
1021 North Grand Avenue East  
P.O. Box 19274  
Springfield, Illinois 62794-9274

Division of Legal Counsel  
Illinois Environmental Protection Agency  
1021 North Grant Avenue East  
P.O. Box 19276  
Springfield, IL 62974-9276



Ilir Imeri

Ilir Imeri, Esq.  
ARDC #: 6306223  
KNELL LAW, L.L.C.  
504 Fayette Street  
Peoria, IL 61603  
P: (309) 655-1530  
F: (309) 655-1535  
E: [iimeri@knelllaw.com](mailto:iimeri@knelllaw.com)