

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PAUL CHRISTIAN PRATAPAS,
Complainant,

v.

LISLE TOWNSHIP HIGHWAY
DEPARTMENT,

Respondent.

Case No. PCB 2023-013

(Citizens Enforcement - Water)

Hearing Officer: Bradley P. Halloran

**RESPONDENT, LISLE TOWNSHIP HIGHWAY DEPARTMENT'S, MOTION FOR
EXTENSION OF TIME TO FILE AN ANSWER AND/OR OTHERWISE PLEAD TO
COMPLAINANT'S AMENDED FORMAL COMPLAINT**

NOW COMES the Respondent, LISLE TOWNSHIP HIGHWAY DEPARTMENT, by and through its attorneys, ANCEL GLINK, P.C., pursuant to 35 Ill. Adm. Code 101.522, and moves the Illinois Pollution Control Board for an extension of time to file and answer/or otherwise plead to Complainant's Amended Formal Complaint. In support thereof, Respondent states as follows:

1. On July 11, 2022, Complainant, Paul Christian Pratapas, filed a Formal Complaint against Respondent, LISLE TOWNSHIP HIGHWAY DEPARTMENT.

2. On September 7, 2022, Complainant filed a motion to modify the Formal Complaint.

3. Respondent, LISLE TOWNSHIP HIGHWAY DEPARTMENT, seeks additional time to file a response to Complainant's Amended Formal Complaint as Respondent recently received documents responsive to the allegations and needs additional time to review these documents.

4. In addition, counsel for Respondent, LISLE TOWNSHIP HIGHWAY DEPARTMENT, Jaime C. Such, further seeks additional time to file an answer and/or responsive pleading due to currently being on trial as of October 20, 2022. This trial will continue until

November 9, 2022, at the Richard J. Daley Center, Law Division, regarding case: *Lionel Watson v. Dawn Food Products, Inc.*, Case No. 2019-L-10229.

WHEREFORE, Respondent, LISLE TOWNSHIP HIGHWAY DEPARTMENT, respectfully requests that the Illinois Pollution Control Board grant an extension of time to November 21, 2022 to file an answer and/or responsive pleading to Complainant's Amended Formal Complaint.

Dated: November 7, 2022

Respectfully Submitted,

**LISLE TOWNSHIP HIGHWAY
DEPARTMENT**

/s/ David S. Silverman
One of the Attorneys for Respondent,
Lisle Township Highway Department

David S. Silverman
Jaime C. Such
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CERTIFICATE OF SERVICE

TO: Don A. Brown
Clerk of the Board
Illinois Pollution Control Board
60 E. Van Buren Street, Ste. 630
Chicago, IL 60605
Don.Brown@illinois.gov

Bradley P. Halloran
Hearing Officer
Illinois Pollution Control Board
60 E. Van Buren Street, Ste. 630
Chicago, IL 60605
Brad.Halloran@illinois.gov

Paul Pratapas
1330 E. Chicago Ave., #110
Naperville, IL
paulpratapas@gmail.com

The undersigned, an attorney, certify that I served **RESPONDENT, LISLE TOWNSHIP HIGHWAY DEPARTMENT'S, MOTION FOR EXTENSION OF TIME TO FILE AN ANSWER AND/OR OTHERWISE PLEAD TO COMPLAINANT'S AMENDED FORMAL COMPLAINT** by emailing a copy of same to the parties listed above on the 7th day of November, 2022, before 5:00 p.m.

ANCEL GLINK, P.C.

By: /s/ David S. Silverman
One of the Attorneys for Respondent

[x] Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he/she verily believes same to be true.

David S. Silverman (dsilverman@ancelglink.com)
Jaime C. Such (jsuch@ancelglink.com)
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