

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

REPUBLIC SERVICES, INC.,	)	
	)	
Petitioner,	)	
	)	
v.	)	PCB No: 24-065
	)	
McLEAN COUNTY, ILLINOIS,	)	(Pollution Control Facility Siting Appeal)
McLEAN COUNTY BOARD, and	)	
LAKESHORE RECYCLING	)	
SYSTEMS, LLC,	)	
	)	
Respondents.	)	

**NOTICE OF FILING**

To: See Attached Service List

PLEASE TAKE NOTICE that I have today electronically filed with the Office of the Clerk of the Illinois Pollution Control Board the attached Motion for Extension of Time, a copy of which is hereby served upon you.

Dated: July 15, 2024

Republic Services, Inc., **Petitioner,**

By: /s/Lucas J. Hall  
One of Its Attorneys

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**PROOF OF SERVICE**

The undersigned hereby certifies that on July 15, 2024, a copy of the foregoing instrument was served on the below parties in this matter via email. 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.

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LAKESHORE RECYCLING	)	
SYSTEMS, LLC,	)	
	)	
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**MOTION FOR EXTENSION OF TIME**

NOW COMES Petitioner, REPUBLIC SERVICES, INC, (“Republic”), by and through its attorneys, Brown, Hay & Stephens, LLP, and moves for an extension of the deadline to serve its written discovery responses upon Respondents, McLEAN COUNTY, ILLINOIS, McLEAN COUNTY BOARD, and LAKESHORE RECYCLING SYSTEMS, LLC (“LRS”). In support thereof, Petitioner states as follows:

1. On June 17, 2024, the Hearing Officer issued an Order providing that written discovery requests were to be served by June 24, 2024, with responses to discovery requests to be served within 21 days.

2. Respondents McLean County Illinois, McLean County Board, and LRS submitted joint interrogatories and production requests to Petitioner on June 24, 2024.

3. Counsel for Petitioner have prepared draft responses to Respondents’ interrogatories and production requests but requires additional time to confer with their clients and obtain additional information and documentation as well as signatures. Accordingly, Petitioner seeks additional time of up to seven (7) days to complete and serve its responses to Respondents’ discovery requests.

4. Pursuant to 35 Ill. Adm. Code 107.504, Respondent LRS, as the siting applicant, has the ability to extend the decision deadline, and thus, the discovery deadline. Although LRS has indicated that it plans to object to this motion on grounds that it would be problematic in light of the agreed-upon deadlines, it has been within their sole authority to waive the decision deadline that has necessitated such expedited discovery.

5. This Motion is made in good faith and not for the purpose of undue delay.

WHEREFORE Petitioner, Republic Services, Inc., moves for an extension of the deadline to serve its written discovery responses upon Respondents.

Republic Services, Inc.,

Petitioner,

By: /s/Lucas J. Hall

One of Its Attorneys

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