



**RECEIVED**  
CLERK'S OFFICE

JUN 18 2003

**OFFICE OF THE ATTORNEY GENERAL**  
STATE OF ILLINOIS

STATE OF ILLINOIS  
*Pollution Control Board*

**Lisa Madigan**  
ATTORNEY GENERAL

June 16, 2003

The Honorable Dorothy Gunn  
Illinois Pollution Control Board  
State of Illinois Center  
100 West Randolph  
Chicago, Illinois 60601

Re: ***People v. Saint-Gobain Containers, Inc., a Delaware corporation***  
**PCB No. 03-22**

Dear Clerk Gunn:

Enclosed for filing please find the original and five copies of a NOTICE OF FILING and MOTION FOR EXTENSION OF TIME TO RESPOND TO RESPONDENT'S DISCOVERY REQUESTS in regard to the above-captioned matter. Please file the original and return a file-stamped copy of the document to our office in the enclosed self-addressed, stamped envelope.

Thank you for your cooperation and consideration.

Very truly yours,

A handwritten signature in black ink, appearing to read "Delbert D. Haschemeyer". The signature is written in a cursive style with a large initial "D".

Delbert D. Haschemeyer  
Environmental Bureau  
500 South Second Street  
Springfield, Illinois 62706  
(217) 782-9031

DDH/pp  
Enclosures

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

RECEIVED  
CLERK'S OFFICE

JUN 18 2003

STATE OF ILLINOIS  
Pollution Control Board

PEOPLE OF THE STATE OF ILLINOIS,  
  
Complainant,  
  
v.  
  
SAINT-GOBAIN CONTAINERS, INC., a Delaware corporation,  
  
Respondent.

PCB NO. 03-22  
(Enforcement)

NOTICE OF FILING

To: N. LaDonna Driver  
Hodge Dwyer Zeman  
3150 Roland Avenue  
P.O. Box 5776  
Springfield, IL 62705-5776

PLEASE TAKE NOTICE that on this date I mailed for filing with the Clerk of the Pollution Control Board of the State of Illinois, a MOTION FOR EXTENSION OF TIME TO RESPOND TO RESPONDENT'S DISCOVERY REQUESTS, a copy of which is attached hereto and herewith served upon you.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS

LISA MADIGAN  
Attorney General of the  
State of Illinois

MATTHEW J. DUNN, Chief  
Environmental Enforcement/Asbestos  
Litigation Division

BY:   
DELBERT D. HASCHEMEYER  
Assistant Attorney General  
Environmental Bureau

500 South Second Street  
Springfield, Illinois 62706  
217/782-9031  
Dated: June 16, 2003

## CERTIFICATE OF SERVICE

I hereby certify that I did on June 16, 2003, send by First Class Mail, with postage thereon fully prepaid, by depositing in a United States Post Office Box a true and correct copy of the following instruments entitled NOTICE OF FILING and MOTION FOR EXTENSION OF TIME TO RESPOND TO RESPONDENT'S DISCOVERY REQUESTS

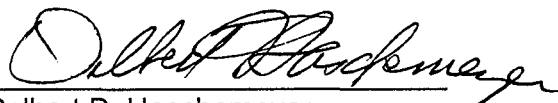
To: N. LaDonna Driver  
Hodge Dwyer Zeman  
3150 Roland Avenue  
P.O. Box 5776  
Springfield, IL 62705-5776

and the original and ten copies by First Class Mail with postage thereon fully prepaid of the same foregoing instrument(s):

To: Dorothy Gunn, Clerk  
Illinois Pollution Control Board  
State of Illinois Center  
Suite 11-500  
100 West Randolph  
Chicago, IL 60601

A copy was also sent by First Class Mail with postage thereon fully prepaid

To: Carol Sudman  
Hearing Officer  
Illinois Pollution Control Board  
600 South Second Street  
Springfield, IL 62704



Delbert D. Haschemeyer  
Assistant Attorney General

This filing is submitted on recycled paper.

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

RECEIVED  
CLERK'S OFFICE

JUN 18 2003

STATE OF ILLINOIS  
Pollution Control Board

PEOPLE OF THE STATE OF )  
ILLINOIS, )  
 )  
 Complainant, )  
 )  
 v. )  
 )  
 SAINT-GOBAIN CONTAINERS, )  
 INC., a Delaware corporation, )  
 )  
 Respondent. )

PCB NO. 03-22  
(Enforcement)

MOTION FOR EXTENSION OF TIME TO RESPOND  
TO RESPONDENT'S DISCOVERY REQUESTS

NOW COMES the Complainant, PEOPLE OF THE STATE OF ILLINOIS, by LISA MADIGAN, Attorney General of the State of Illinois, and pursuant to 35 Ill. Adm. Code Sections 101.502, 101.422 and 101.610(n), requests that the Hearing Officer grant Complainant's Motion for Extension of Time to Respond to Respondent's Discovery Requests. In support of this Motion, Complainant states as follows:

1. On or about May 27, 2003, Respondent served its Requests for Production and First Set of Interrogatories Directed to the Complainant on Complainant.
2. Pursuant to the Illinois Pollution Control Board's procedural rules at 35 Ill. Adm. Code Part 101, responses to Respondent's discovery are currently due within 28 days of service, *i.e.*, June 24, 2003.
3. Complainant is attempting to respond to the Respondent's discovery requests. Nevertheless, Complainant will be unable to complete its responses by June 24, 2003. Therefore, Respondent requests an extension of time for 30 days, to and including July 24, 2003, in which to file its responses to Respondent's discovery requests.
4. This Motion is made in good faith and not for purposes of delay.

5. Counsel for the Complainant has contacted counsel for the Respondent, and he has indicated that he has no objection to this request being granted.

WHEREFORE, for the above and foregoing reasons, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Hearing Officer grant this Motion for Extension of Time, and allow the Complainant an extension of time for 30 days, or until July 24, 2003, in which to file its responses to Respondent's Requests for Production and First Set of Interrogatories Directed to the Complainant.


Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS,

LISA MADIGAN,  
Attorney General  
of the State of Illinois,

MATTHEW J. DUNN, Chief  
Environmental Enforcement/Asbestos  
Litigation Division

BY:

  
DELBERT D. HASCHEMEYER  
Assistant Attorney General  
Environmental Bureau

500 South Second Street  
Springfield, Illinois 62706  
217/782-9031

Dated: 6/16/03

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF )  
ILLINOIS, )  
 )  
Complainant, )  
 )  
v. )  
 )  
SAINT-GOBAIN CONTAINERS, )  
INC., a Delaware corporation, )  
 )  
Respondent. )

PCB NO. 03-22  
(Enforcement)

AFFIDAVIT OF DELBERT D. HASCHEMEYER

1. I am a licensed Illinois attorney, and counsel of record for Complainant, State of Illinois.
2. I have assisted in the preparation of, and have reviewed, Complainant's Motion for Extension of Time to Respond to Respondent's Discovery Requests ("Motion").
3. The statements contained in the Motion, that are not otherwise of record, are true and accurate to the best of my knowledge and belief.

FURTHER AFFIANT SAYETH NOT.

  
DELBERT D. HASCHEMEYER

SUBSCRIBED AND SWORN to  
before me this 16th day of June, 2003.

  
Notary Public

