

**BEFORE THE POLLUTION CONTROL BOARD
OF THE STATE OF ILLINOIS**

PEOPLE OF THE STATE OF ILLINOIS)	
<i>ex rel.</i> LISA MADIGAN, Attorney General)	
of the State of Illinois)	
)	PCB 2008-007
Complainant,)	
)	
vs.)	<i>VIA ELECTRONIC FILING</i>
)	
UNION PACIFIC RAILROAD COMPANY,)	
a Delaware corporation,)	
)	
Respondent.)	

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO RESPOND OR ANSWER**

Union Pacific Railroad Company (“Union Pacific”) respectfully moves, pursuant to 35 Ill. Adm. Code § 101.522, that the Illinois Pollution Control Board (the “Board”) grant a 60-day extension for Union Pacific to respond or answer the Complaint of the People of the State of Illinois (“AG”). In support of this motion, Union Pacific states, as follows:

1. Union Pacific was served on July 19, 2007.
2. The current due date for Union Pacific to respond or answer is August 20, 2007 or September 17, 2007, respectively.
3. Counsel for Union Pacific has discussed an extension of time with counsel for the AG for the purpose of settlement discussions, and counsel for the AG has no objection to the requested extension.


Electronic Filing, Received, Clerk's Office, August 15, 2007

WHEREFORE, Union Pacific Railroad Company respectfully requests that the Illinois Pollution Control Board grant this motion and extend the date in which to respond or answer the Complaint of the People of the State of Illinois.

Dated: August 15, 2007

Respectfully submitted,

SONNENSCHN NATH & ROSENTHAL LLP

By: 
Attorneys for respondent
Union Pacific Railroad Company

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CERTIFICATE OF SERVICE

I, Thomas A. Andreoli, an attorney, hereby certify that I caused a copy of the Unopposed Motion for Extension of Time to Respond or Answer of Union Pacific Railroad Company, along with Notice of Filing and Certificate of Service, to be served upon the service list on August 15, 2007, by electronic mail and regular mail.



Thomas A. Andreoli