

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)
)
Complainant,)
)
vs.) PCB No. 04-207
) (Enforcement – Land)
EDWARD PRUIM and ROBERT PRUIM,)
)
Respondents.)

PEOPLE OF THE STATE OF ILLINOIS,)
)
Complainant,)
)
vs.) PCB No. 97-193
) (Enforcement – Land)
COMMUNITY LANDFILL COMPANY,) (consolidated)
INC.,)
)
Respondent.)

NOTICE OF FILING

TO: Christopher Grant
Jennifer Van Wie
Environmental Bureau
Assistant Attorney General
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Bradley Halloran
Hearing Officer
Illinois Pollution Control Board
100 West Randolph, Suite 11-500
Chicago, Illinois 60601
hallorab@ipcb.state.il.us

PLEASE TAKE NOTICE that on **MARCH 19, 2009**, the undersigned caused to be electronically filed with Mr. John Therriault, of the Illinois Pollution Control Board, 100 West Randolph Street, Suite 11-500, Chicago, Illinois 60601, the **RESPONDENTS COMMUNITY LANDFILL COMPANY, INC., ROBERT PRUIM AND EDWARD PRUIM'S MOTION FOR EXTENSION OF TIME TO FILE POST-HEARING BRIEF**, a copy of which is attached and hereby served upon you.

/s/ Mark A. LaRose
One of the Attorneys for Respondents

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**RESPONDENTS COMMUNITY LANDFILL COMPANY, INC.,
 EDWARD PRUIM AND ROBERT PRUIM'S MOTION
 FOR EXTENSION OF TIME TO FILE POST-HEARING BRIEF**

Respondents, Community Landfill Company, Inc., Edward Pruim and Robert Pruim, by and through their attorneys LaRose & Bosco, Ltd., and pursuant to 35 Ill.Adm. Code 101.502(a) and 101.522 hereby move Hearing Officer Bradley Halloran for an extension of time to file their Post-Hearing Brief, and in support thereof, state as follows:

1. On January 22, 2009, Hearing Officer Bradley Halloran entered an order setting a briefing schedule wherein Respondents are to file their Post-Hearing Brief on or before April 6, 2009, and Complainant is to file its Reply, if any, on or before April 20, 2009.

Electronic Filing - Received, Clerk's Office, March 19, 2009

2. Respondents have been and are continuing to work diligently on their Post-Hearing Brief.

3. Attorney Clarissa Y. Cutler is a lead attorney in the case primarily responsible for preparing the Post-Hearing Brief.

4. During the week of March 16, 2009, Attorney Cutler had two deaths in her immediate family, and has personal business that needs to be attended to as a result thereof.

5. On March 19, 2009, counsel for Respondents, Mark A. LaRose, contacted counsel for Complainant, Christopher Grant, to seek his concurrence in this motion. Attorney Grant agrees with this motion.

6. Counsel for the parties agree to Complainant being granted a commensurate extension of time to file its Reply Brief.

7. Respondents respectfully request an extension, until May 4, 2009, to file their Post-hearing Brief, and for Complainant to file its Reply Brief by May 18, 2009.

8. This motion is made in good faith and not for the purposes of delay.

9. Granting this extension of time will not result in prejudice to any of the parties involved in this litigation.

WHEREFORE, Respondents respectfully request that Hearing Officer Bradley Halloran grant Respondents' Motion for an Extension of Time to File Their Post-Hearing Brief until May 4, 2009, and allow a commensurate extension of time for Complainant to file its Reply Brief, until May 18, 2009.

Respectfully submitted,

/s/ Mark A. LaRose
Attorneys for Respondents

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CERTIFICATE OF SERVICE

I, Clarissa Y. Cutler, an attorney, hereby certify that I caused to be served a copy of the foregoing **RESPONDENTS COMMUNITY LANDFILL COMPANY, INC., ROBERT PRUIM AND EDWARD PRUIM'S MOTION FOR EXTENSION OF TIME TO FILE POST-HEARING BRIEF**, by electronic filing, emailing, and by placing same in first-class postage prepaid envelopes and depositing same in the U.S. Mail Box located at 200 North LaSalle Street, Chicago, Illinois, this 19th day of **MARCH, 2009**, addressed as follows:

By U.S. Mail and email

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Jennifer Van Wie
Environmental Bureau
Assistant Attorney General
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