


**STATE OF ILLINOIS  
POLLUTION CONTROL BOARD  
JAMES R. THOMPSON CENTER  
100 W. RANDOLPH STREET, SUITE 11-500  
CHICAGO, IL 60601**

PETER AREDOVICH )  
 )  
 Complainant, )  
 )  
 v. ) PCB 2009-102  
 )  
 ILLINOIS STATE TOLL )  
 HIGHWAY AUTHORITY, )  
 )  
 Respondent. )

**NOTICE OF FILING**

To: Mr. Peter Arendovich  
1388 Gordon Lane  
Lemont, Illinois 60439

Please take notice that on the 27<sup>th</sup> day of May, 2009, Respondent, Illinois State Toll Highway Authority's APPEARANCE and MOTION FOR EXTENSION OF TIME were filed with the Clerk of the Pollution control Board, James R. Thompson Center, 100 W. Randolph Street, Suite 11-500, Chicago, IL 60601 via electronic filing.

  
ROBERT T. LANE  
Assistant Attorney General  
Illinois Toll Highway Authority  
2700 Ogden Avenue  
Downers Grove, IL 60515  
(630) 241-6800 (x1530)

LISA MADIGAN,  
Attorney General of Illinois

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PETER AREDOVICH )  
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 ILLINOIS STATE TOLL )  
 HIGHWAY AUTHORITY, )  
 )  
 Defendant. )

**ILLINOIS STATE TOLL HIGHWAY AUTHORITY'S  
MOTION FOR EXTENSION OF TIME**

Defendant, Illinois State Toll Highway Authority "Tollway", pursuant to 415 ILCS 5/31(d) and 35 Ill. Admn. Code 103.212, by and through its attorney, LISA MADIGAN, moves the Pollution Control Board for an extension of time to research and file a motion pursuant to 415 ILCS 5/31(d) and 35 ILCS 101.202. In support of its motion, the defendant Tollway states as follows:

1. I am an Assistant Attorney General and have been assigned to represent the Tollway in this matter.
2. The underlying Complaint was received by the Tollway on April 29, 2009.
3. This is the first Pollution Control Board matter that counsel has been assigned and previous to this point, has not had occasion to research this area of the law.
4. That the Tollway is required to submit its motion pursuant to 415 ILCS 5/31(d) and 35 ILCS 101.202 on or before June 1, 2009.
5. While it has not completed its research, the Tollway believes it may have a

meritorious defense that would require dismissal of this matter.

6. That counsel assigned to this case is confident that it will be able to file its motion pursuant to 415 ILCS 5/31(d) and 35 ILCS 101.202 within 45 days, or on or before July 15, 2009.

7. That the Complainant will not be prejudiced if this motion for extension of time is granted.

8. That this motion is not intended to unnecessarily delay this matter.

WHEREFORE, the Tollway respectfully moves this HONORABLE BOARD to grant its motion and allow it an additional 45 days, or until July 15, 2009, to file its Motion to Dismiss pursuant to 415 ILCS 5/31(d) and 35 ILCS 101.202.

LISA MADIGAN  
Attorney General of Illinois

By:



ROBERT T. LANE  
Senior Assistant Attorney General  
Ill. Toll Highway Authority  
2700 W. Ogden Avenue  
(630) 241-6800 x1530

**CERTIFICATE OF SERVICE**

The undersigned, being first duly sworn upon oath, deposes and states that a copy of this notice and Respondent's APPEARANCE and MOTION FOR EXTENSION OF TIME were served upon the above named at the above address by depositing the same in the United States mail chute located at 2700 Ogden Avenue, Downers Grove, Illinois 60515 on the 27th day of May, 2009 with proper postage prepaid. I, Robert T. Lane, hereby certify to the foregoing subject to penalty for perjury in accordance with Section 1-109 of the Illinois Civil Practice Act.

*Nancy L. Cordew*

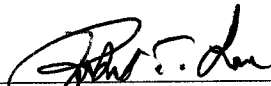
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 ILLINOIS STATE TOLL HIGHWAY )  
 AUTHORITY, )  
 )  
 Respondent, )

**APPEARANCE**

TO: Mr. Peter Arendovich  
1388 Gordon Lane  
Lemont, IL 60439

I, ROBERT T. LANE, Assistant Attorney General, hereby enter my Appearance in the above matter on behalf of THE ILLINOIS STATE TOLL HIGHWAY AUTHORITY.

  
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ROBERT T. LANE  
Assistant Attorney General  
Illinois Toll Highway Authority  
2700 Ogden Avenue  
Downers Grove, IL 60515  
(630) 241-6800 - Ext. 1530

LISA MADIGAN,  
Attorney General of Illinois