

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:

PEOPLE OF THE STATE OF)
ILLINOIS)

Complainant,)

ENVIRONMENTAL LAW AND)
POLICY CENTER, on behalf of PRAIRIE)
RIVERS NETWORK and SIERRA CLUB,)
ILLINOIS CHAPTER,)

Intervenor,)

v.)

FREEMAN UNITED COAL)
MINING CO., L.L.C., and)
SPRINGFIELD COAL CO., L.L.C.,)

Respondents.)

PCB 2010-061
(Enforcement – Water)

ENVIRONMENTAL LAW AND)
POLICY CENTER, on behalf of PRAIRIE)
RIVERS NETWORK and SIERRA CLUB,)
ILLINOIS CHAPTER,)

Complainant,)

v.)

FREEMAN UNITED COAL)
MINING CO., L.L.C., and)
SPRINGFIELD COAL CO., L.L.C.,)

Respondents.)

PCB 2011-002
(Enforcement – Water)
(Consolidated)

MOTION FOR EXTENSION OF TIME TO RESPOND TO PRAIRIE RIVERS NETWORK'S FIRST REQUESTS TO ADMIT, INTERROGATORIES, AND REQUEST FOR PRODUCTION OF DOCUMENTS TO SPRINGFIELD COAL COMPANY

COMES NOW Respondent, Springfield Coal Co., L.L.C. ("Springfield Coal"), and pursuant to 35 Ill. Admin. Code § 101.522, requests an extension of time to respond to Prairie Rivers Network's First Requests to Admit, Interrogatories, and Request for Production of Documents dated November 28, 2011 ("First Discovery Requests").

1. Prairie Rivers Network has submitted 31 Requests for Admission, 8 Interrogatories, and 5 Request for Production of Documents to Springfield Coal in the First Discovery Requests. Notably, some of the Requests and Interrogatories require the production of a sizable number of documents.

2. Springfield Coal respectfully asks the Board to extend the deadline to respond to the First Discovery Requests by thirty (30) days until January 31, 2012. This extension of time will allow Springfield Coal to properly respond to the First Discovery Requests. The extension of time will not unduly burden any party to this case.

3. Counsel for Springfield Coal has spoken with Counsel for Prairie Rivers Network regarding this request. Prairie Rivers Network has no objection to Springfield Coal having an additional thirty (30) days to respond to the First Discovery Requests.

WHEREFORE, Respondent, SPRINGFIELD COAL CO., L.L.C. respectfully asks that the time to provide responses to Prairie Rivers Network's First Requests to Admit, Interrogatories, and Request for Production of Documents to Springfield Coal Company be EXTENDED until January 31, 2012.

Dated: December 12, 2011

BRYAN CAVE LLP

By: 

Dale A. Guariglia, Missouri Bar #32998

John R. Kindschuh #6284933

One Metropolitan Square

211 North Broadway Suite 3600

St. Louis, MO 63102

Telephone: (314) 259-2000

Telefax: (314) 259-2020

Attorneys for Respondent, Springfield Coal Co., L.L.C

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NOTICE OF ELECTRONIC FILING

TO: Thomas Davis
Assistant Attorney General
Environmental Bureau
500 South Second Street
Springfield, IL 62706

E. Lynn Grayson
Jenner & Block LLP
353 N. Clark Street
Chicago, IL 60654-3456

Carol Webb
Hearing Officer
Illinois Pollution Control Board
1021 North Grand Avenue East
Springfield, IL 62794

Jessica Dexter
Environmental Law & Policy Center
35 E. Wacker Dr., Ste. 1300
Chicago, IL 60601

John Therriault, Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph St., Suite 11-500
Chicago, IL 60601

James A. Vroman
James A. Vroman, P.C.
2S335 Arrowhead Drive
Wheaton, IL 60189

PLEASE TAKE NOTICE that on December 12, 2011, I electronically filed with the Clerk of the Pollution Control Board, Springfield Coal Co., L.L.C.'s Motion for Extension of Time to Respond to Prairie Rivers Network's First Requests to Admit, Interrogatories, and Request for Production of Documents to Springfield Coal Company, copies of which are herewith served upon you.

BRYAN CAVE LLP

By: 

Dale A. Guariglia, Missouri Bar #32998
John R. Kindschuh #6284933
One Metropolitan Square
211 North Broadway Suite 3600
St. Louis, MO 63102
Telephone: (314) 259-2000
Telefax: (314) 259-2020

Attorneys for Respondent, Springfield Coal
Co., L.L.C