

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

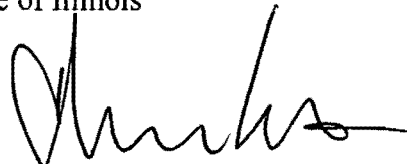
PEOPLE OF THE STATE OF ILLINOIS,)
)
Complainant,)
)
vs.) PCB 04-16
)
PACKAGING PERSONIFIED, INC.,) (Enforcement)
an Illinois corporation,)
)
Respondent.)

NOTICE OF FILING

PLEASE TAKE NOTICE that on April 13, 2012, Complainant filed its Motion to Stay Discovery and Extend Record Deadline by electronic filing. A copy of Complainant's Motion is attached hereto and herewith served upon you.

PEOPLE OF THE STATE OF ILLINOIS
ex rel. LISA MADIGAN
Attorney General of the
State of Illinois

BY:



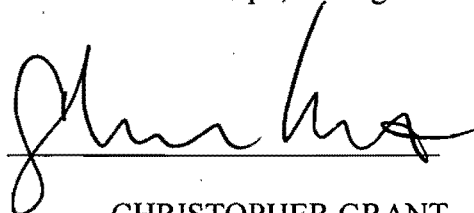
CHRISTOPHER GRANT
Assistant Attorney General
Environmental Bureau
69 W. Washington Street, #1800
Chicago, Illinois 60602
(312) 814-5388

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)	
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Complainant,)	
)	
vs.)	PCB 04-16
)	
PACKAGING PERSONIFIED, INC.,)	(Enforcement-Air)
an Illinois corporation,)	
)	
Respondent.)	

CERTIFICATE OF SERVICE

I, CHRISTOPHER GRANT, an attorney, do certify that I caused to be served this 13th day of April, 2012, the foregoing Motion to Stay Discovery and Extend Record Deadline, and Notice of Filing, upon the persons listed below, by placing same in an envelope bearing sufficient postage with the United States Postal Service located at 100 W. Randolph, Chicago Illinois.


CHRISTOPHER GRANT

Service List:

Mr. Roy Harsch
Mr. John Simon
Drinker Biddle Reath
191 N. Wacker Drive, Suite 3700
Chicago, IL 60606

Mr. Bradley P. Halloran
Hearing Officer
Illinois Pollution Control Board
100 W. Randolph
Chicago IL 60601 (by hand delivery)

Mr. John Therriault
Illinois Pollution Control Board
100 W. Randolph
Chicago, IL (by electronic filing)

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)	
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Complainant,)	
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v.)	PCB 04-16
)	(Enforcement - Air)
PACKAGING PERSONIFIED, INC., an)	
Illinois corporation,)	
)	
Respondent.)	

MOTION TO STAY DISCOVERY AND EXTEND RECORD DEADLINE

NOW COMES Complainant, PEOPLE OF THE STATE OF ILLINOIS, by LISA MADIGAN, Attorney General of the State of Illinois, and respectfully requests that the Illinois Pollution Control Board (“Board”) stay discovery and extend the deadline established for the close of record in this matter. In support, Complainant states, as follows.

1. In its March 1, 2012 Order directing further hearing in this case, the Board directed the record to be completed by August 28, 2012. Hearing Officer Bradley P. Halloran has advised the parties that hearing will need to be held on or about June 5, 2012, to meet this deadline.

2. On March 28, 2012, Complainant filed its Motion for Reconsideration of the Board’s March 1, 2012 Order (“Motion for Reconsideration”). In its Motion, Complainant argues that a new hearing on Respondent’s alternative ‘lowest cost of compliance theory’ is unnecessary, and that the Board should reinstate its September 8, 2012 Final Order. By agreement, Respondent will file its Response to Complainant’s Motion by April 20, 2012.

3. Complainant requests that the Board stay proceedings in this matter until after it reaches a decision on Complainant’s Motion for Reconsideration. If the Board grants the

Motion, additional discovery and trial preparation will be unnecessary. And if the Board denies Complainant's Motion, it can then establish a new date for close of the record.

4. The requested stay will allow the parties to avoid the expense of expediting discovery for an early and possibly unnecessary hearing.

WHEREFORE, complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Board stay discovery in this matter, and continue the deadline for the close of record in this Matter from August 28, 2012 to a date to be established after the Board's decision on Complainant's Motion for Reconsideration.

RESPECTFULLY SUBMITTED

PEOPLE OF THE STATE OF ILLINOIS
by LISA MADIGAN,
Attorney General of the State of Illinois

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

BY:



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