

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)	
Complainant,)	
v.)	PCB No. 12-21
)	(Enforcement - -Land)
ALTIVITY PACKAGING, LLC,)	
a Delaware limited liability company)	
INTRA-PLANT MAINTENANCE)	
CORPORATION, an Illinois corporation,)	
IRONHUSTLER EXCAVATING, INC.,)	
an Illinois corporation, and)	
RON BRIGHT, d/b/a Quarter Construction,)	
)	
Respondents.)	

MOTION FOR EXTENSION OF TIME

NOW COME Respondents, IRONHUSTLER EXCAVATING, INC., an Illinois corporation, and RON BRIGHT, d/b/a Quarter Construction (hereinafter "Respondents"), and for their Motion for Extension of Time to file Respondents' Answers and Objections to Complainant's Motion for Summary Judgment, state as follows:

1. Respondents' Answers and Objections to Complainant's Motion for Summary Judgment are due on March 28, 2013.
2. The undersigned attorney has been unable to complete the preparation of Respondent's Answers and Objections and accompanying exhibits to Complainant's Motion for Summary Judgment due to the press of professional responsibilities and court proceedings in other matters, as well as a recurrence of personal health issues.

3. The undersigned attorney has been in contact with the attorney for Complainant, and advised him of the filing of the instant motion. He is not at liberty to state his agreement with this motion.

WHEREFORE, Respondents pray this Motion for Extension of Time is granted and Respondents be given to and including April 29, 2013, to file their Answers and Objections to Complainant's Motion for Summary Judgment.

Respectfully Submitted,
Respondents Ironhustler & Bright

By: \s\ *Thomas J. Timmel*,
Their attorney

Feldman Wasser Draper & Cox
PO Box 2418
1307 South Seventh Street
Springfield, Illinois 62705
(217) 544-3403

timmel@feldman-wasser.com

Certificate of Service

The undersigned attorney hereby certifies that a copy of the foregoing *Motion for Extension of Time* has been served upon the persons listed below by emailing same to each of them and also placing the same in a sealed envelope, addressed as indicated, with postage fully prepaid and by depositing the same in the United States mail at Springfield, Illinois this 27th day of March, 2013:

Raymond J. Callery
Assistant Attorney General
Environmental Enforcement Bureau
Office of the Illinois Attorney General
500 South Second Street
Springfield, Illinois 62706

William O'Neal
Winston & Strawn
35 West Wacker Drive
Suite 4200
Chicago, IL 60601-9703

Charles M. Rock
Hassellberg Rock Bell & Kuppler, LLP
4600 North Brandywine Dr.
Suite 200
Peoria, IL 61614

Carol Webb, Hearing Officer
Illinois Pollution Control Board
1021 North Grand Avenue East
PO Box 19274
Springfield, IL 62794-9274

and that the original of said Motion for Extension of Time has be e-filed with the Clerk of the Illinois Pollution Control Board on the same date.

\s\Thomas J. Immel