

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,) AC 12-51
)
Complainant,)
) (IEPA No. 87-12-AC)
v.)
)
NORTHERN ILLINOIS)
SERVICE COMPANY,)
)
Respondent.)

NOTICE OF FILING

TO: John T. Therriault (E-FILED)
Assistant Clerk
Illinois Pollution Control Board
100 West Randolph Street, Suite 11-500
Chicago, IL 60601-3218

Bradley P. Halloran
Hearing Officer
Illinois Pollution Control Board
100 West Randolph Street, Suite 11-500
Chicago, IL 60601-3218

Scott B. Sievers
Special Assistant Attorney General
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

PLEASE TAKE NOTICE that I have electronically filed with the Office of the Clerk of the Pollution Control Board Motion to Extend Time in which to Reply to Complainant's Motion for Summary Judgment, a copy of which is herewith served upon you.

NORTHERN ILLINOIS SERVICE COMPANY,
Respondent,

By Peter DeBruyne, P.C.

By 
Peter DeBruyne, Its Attorney

Peter DeBruyne
A.R.D.C. #0599840
Peter DeBruyne, P.C.
838 North Main Street
Rockford, IL 61103
Telephone (815) 964-3810
Fax (815) 964-3813
Email: pdebruyne@sbcglobal.net

CERTIFICATE OF SERVICE


Peter DeBruyne hereby certifies that he has served a copy of the foregoing NOTICE OF FILING upon:

John T. Therriault (E-FILED)
Assistant Clerk
Illinois Pollution Control Board
100 West Randolph Street, Suite 11-500
Chicago, IL 60601-3218

Bradley P. Halloran
Hearing Officer
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Scott B. Sievers
Special Assistant Attorney General
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

by enclosing true copies thereto to Bradley P. Halloran and Scott B. Sievers at the addresses referred to above in envelopes duly addressed bearing proper first class postage and deposited in the United States mail at Rockford, Illinois, on March 11, 2014.


Peter DeBruyne

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,) AC 12-51
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Complainant,)
) (IEPA No. 87-12-AC)
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NORTHERN ILLINOIS)
SERVICE COMPANY,)
)
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**MOTION TO EXTEND TIME IN WHICH TO REPLY TO
COMPLAINANT'S MOTION FOR SUMMARY JUDGMENT**

NOW COMES the respondent, NORTHERN ILLINOIS SERVICE COMPANY, by its attorney, Peter DeBruyne, P.C. and, pursuant to 35 Ill. Adm. Code 101.516a), moves the Hearing Officer to set a time for the filing of respondent's reply to Complainant's Motion for Summary Judgment at April 7, 2014. In support, the respondent states the following:

1. Complainant's Motion to Extend Dispositive Motion Schedule proposing a March 31, 2014 date for respondent's reply to the Motion for Summary Judgment has as yet been ruled upon by the Pollution Control Board;
2. 35 Ill. Adm. Code 101.516a) requires a response to a Motion for Summary Judgment within 14 days of its filing;
3. Complainant filed its Motion for Summary Judgment on February 18, 2014;
4. Upon return of respondent's counsel from vacation at the end of February, he was confronted with new pressing litigation matters in his office;
5. Counsel for complainant has no objection to the granting of this Motion.

WHEREFORE, the respondent, NORTHERN ILLINOIS SERVICE COMPANY, moves the Hearing Officer to extend the timeline for the reply to Complainant's Motion for Summary Judgment to April 7, 2014.

NORTHERN ILLINOIS SERVICE COMPANY,
Respondent,

By Peter DeBruyne, P.C.

By 
Peter DeBruyne, Its Attorney

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A.R.D.C. #0599840
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CERTIFICATE OF SERVICE

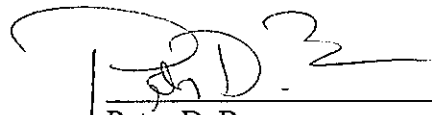
Peter DeBruyne hereby certifies that he has served a copy of the foregoing MOTION TO EXTEND TIME IN WHICH TO REPLY TO COMPLAINANT'S MOTION FOR SUMMARY JUDGMENT upon:

John T. Therriault (E-FILED) 3/11/2014
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Peter DeBruyne