

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY)	
)	
Complainant,)	
)	
v.)	AC 2012-051
)	(IEPA No. 87-12-AC)
NORTHERN ILLINOIS)	(Administrative Citation)
SERVICE COMPANY,)	
)	
Respondent.)	

NOTICE

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

Peter DeBruyne
Peter DeBruyne, P.C.
838 North Main Street
Rockford, IL 61103

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

PLEASE TAKE NOTICE that I have today caused to be filed a MOTION FOR EXTENSION OF TIME TO FILE COMPLAINANT'S REPLY with the Illinois Pollution Control Board, a copy of which is served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY,

Dated: April 25, 2014

Scott B. Sievers
Attorney Registration No. 6275924
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
(217) 782-5544

Complainant,

BY: 

Scott B. Sievers
Special Assistant Attorney General

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY)	
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Complainant,)	
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v.)	AC 2012-051
)	(IEPA No. 87-12-AC)
NORTHERN ILLINOIS)	(Administrative Citation)
SERVICE COMPANY,)	
)	
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**MOTION FOR EXTENSION OF TIME
TO FILE COMPLAINANT'S REPLY**

NOW COMES the Complainant, ILLINOIS ENVIRONMENTAL PROTECTION AGENCY ("Illinois EPA"), by and through its counsel, Special Assistant Attorney General Scott B. Sievers, and, pursuant to 35 Ill. Adm. Code 101.500, moves the Hearing Officer to extend the time for the filing of the Complainant's reply to the Respondent's Memorandum of Law in Response to Complainant's Motion for Summary Judgment. In support, the Complainant states the following:

1. On April 2, 2014, the Hearing Officer entered an Order providing that the Respondent's response to the Complainant's motion for summary judgment would be filed on or before April 7, 2014, with the Complainant's reply to be filed on or before April 28, 2014.
2. Subsequent to the filing of the Respondent's response on April 7, 2014, the undersigned's workload has been heavier than originally anticipated; consequently, the undersigned is not able to finish drafting and to file Complainant's reply brief by April 28, 2014.
3. The Complainant moves the honorable Hearing Officer for a four (4) day extension of time to file its reply brief, from Monday, April 28, 2014 to Friday, May 2, 2014.

4. The undersigned has conferred with opposing counsel, and opposing counsel has no objection to Complainant's motion.

5. A telephonic status conference is set for May 14, 2014 in this action, and granting this motion will not adversely affect that hearing.

WHEREFORE, the Complainant, ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, moves the Hearing Officer to extend the time for filing Complainant's reply to the Respondent's summary judgment response by four (4) days, from Monday, April 28, 2014 to Friday, May 2, 2014.

Dated: April 25, 2014

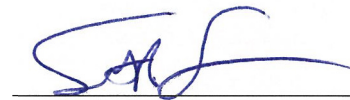
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Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY,

Complainant,

BY:



Scott B. Sievers
Special Assistant Attorney General

Illinois Environmental Protection Agency v. Northern Illinois Service Company
Pollution Control Board No. AC 2012-051

CERTIFICATE OF SERVICE

Scott B. Sievers, Special Assistant Attorney General, herein certifies that he has served a copy of the foregoing **MOTION FOR EXTENSION OF TIME TO FILE**

COMPLAINANT'S REPLY upon:

John Therriault
Assistant Clerk
Illinois Pollution Control Board
100 West Randolph Street, Suite 11-500
Chicago, Illinois 60601-3218

Peter DeBruyne
Peter DeBruyne, P.C.
838 North Main Street
Rockford, IL 61103

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

by mailing true copies thereof to the addresses referred to above in envelopes duly addressed bearing proper first class postage and deposited in the United States mail at Springfield, Illinois, on April 25, 2014.

Respectfully submitted,


ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY,

Dated: April 25, 2014

Scott B. Sievers
Attorney Registration No. 6275924
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
(217) 782-5544

Complainant,

BY:



Scott B. Sievers
Special Assistant Attorney General