

**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  
 Clerk of the Board  
 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

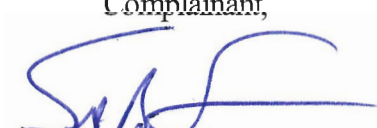
PLEASE TAKE NOTICE that I have today caused to be filed a MOTION FOR EXTENSION OF TIME TO FILE REPLY with the Illinois Pollution Control Board, a copy of which is served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL  
 PROTECTION AGENCY,

Dated: November 3, 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

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NORTHERN ILLINOIS	)	(Administrative Citation)
SERVICE COMPANY,	)	
	)	
Respondent.	)	

**MOTION FOR EXTENSION OF TIME TO FILE 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 101.502 and 35 Ill. Adm. Code 101.522, moves the Hearing Officer for a two (2) day extension of time to file its reply in this action. In support, the Complainant states the following:

1. Section 101.522 of the Board rules provides that “[t]he Board or hearing officer, for good cause shown on a motion after notice to the opposite party, may extend the time for filing any document or doing any act which is required by these rules to be done within a limited period, either before or after the expiration of time.” 35 Ill. Adm. Code 101.522.

2. The Complainant’s reply to the Respondent’s post-hearing brief presently is due to be filed by November 3, 2014.

3. Due to a workload that has been heavier than anticipated and despite his good-faith efforts to draft and file Complainant’s reply by the November 3, 2014 deadline, the undersigned has been unable to do so.

4. Consequently, to allow additional time to draft Complainant's reply, the Complainant moves the Hearing Officer for a two (2) day extension of time to file Complainant's reply, from November 3 to November 5, 2014.

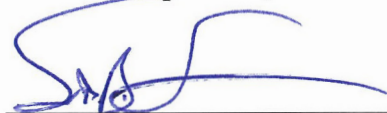
5. The undersigned has conferred with opposing counsel, and opposing counsel has no objection to Complainant's motion.

WHEREFORE, the Complainant, ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, prays that the honorable Hearing Officer ALLOW the Complainant's Motion for Extension of Time to File Reply and extend the time to file Complainant's reply by two (2) days, from November 3 to November 5, 2014.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY,

Complainant,



BY:

\_\_\_\_\_  
Scott B. Sievers  
Special Assistant Attorney General

Dated: November 3, 2014

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

*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 REPLY** upon:

John Therriault  
Clerk of the Board  
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 November 3, 2014.

Respectfully submitted,

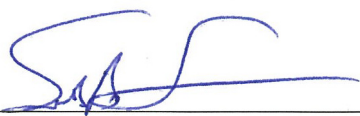
ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY,

Dated: November 3, 2014

Scott B. Sievers  
Attorney Registration No. 6275924  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, Illinois 62794-9276  
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Complainant,

BY:

  
\_\_\_\_\_  
Scott B. Sievers  
Special Assistant Attorney General