

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

CLINTON LANDFILL, INC.,)
)
 Petitioner,)
)
 v.)
)
 ILLINOIS ENVIRONMENTAL)
 PROTECTION AGENCY,)
)
 Respondent.)

PCB 15-60
 (Permit Appeal - Land)

NOTICE OF ELECTRONIC FILING

PLEASE TAKE NOTICE that on the 14th day of November 2014, I have filed with the Office of the Clerk of the Pollution Control Board the Respondent's Unopposed Motion for Extension of Time to File a Response to Clinton Landfill, Inc.'s Motion for Partial Summary Judgment Regarding Changes to Special Condition Section III.A.2.f (MGP Waste). A copy of which is attached hereto and hereby served upon the persons listed in the attached Service List.

ILLINOIS ENVIRONMENTAL
 PROTECTION AGENCY

By LISA MADIGAN
 Attorney General of the
 State of Illinois


 Stephen J. Sylvester
 Assistant Attorney General
 Environmental Bureau
 69 W. Washington Street, Suite 1800
 Chicago Illinois, 60602
 (312) 814-2087
ssylvester@atg.state.il.us

Date: November 14, 2014

SERVICE LIST

For Petitioner:

Brian J. Meginnes
Janaki Nair
Elias, Meginnes, Riffle & Seghetti, P.C.
416 Main Street, Suite 1400
Peoria, Illinois 61602-1153
(by electronic mail at bmeginnes@emrslaw.com and jnair@emrslaw.com)

For Respondent:

James Jennings
Division of Legal Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
(by electronic mail at James.M.Jennings@Illinois.gov)

For the Illinois Pollution Control Board:

Carol Webb
Hearing Officer
Illinois Pollution Control Board
1021 North Grand Avenue East
P.O. Box 19274
Springfield, Illinois 62794-9274
(by electronic mail at carol.webb@illinois.gov)

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

CLINTON LANDFILL, INC.,)	
)	
Petitioner,)	
)	
v.)	PCB 15-60
)	(Permit Appeal - Land)
ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY,)	
)	
Respondent.)	

**RESPONDENT’S UNOPPOSED MOTION
FOR EXTENSION OF TIME TO FILE A RESPONSE
TO PETITIONER’S MOTION FOR PARTIAL SUMMARY JUDGMENT**

NOW COMES Respondent, ILLINOIS ENVIRONMENTAL PROTECTION AGENCY (“IEPA”), by and through the Attorney General of the State of Illinois, *ex rel.* LISA MADIGAN and pursuant to 35 Ill. Adm. Code 101.516, hereby moves the Hearing Officer to grant an extension of time to file its response to Clinton Landfill, Inc.’s Motion for Partial Summary Judgment Regarding Changes to Special Condition Section III.A.2.f (MGP Waste). In support of this motion, Respondent states as follows:

1. On November 10, 2014, Petitioner, Clinton Landfill, Inc. (“CLI”) filed its Motion for Partial Summary Judgment Regarding Changes to Special Condition Section III.A.2.f (MGP Waste) (“MPSJ”).

2. Section 101.516(a) of the Pollution Control Board (“Board”) Procedural Regulations provides, in part, that any “response to a motion for summary judgment must be filed within 14 days after service of the motion for summary judgment.” 35 Ill. Adm. Code 101.516(a).

3. In addition, Section 101.516(a) of the Board Procedural Regulations allows the hearing officer to “extend the filing and response deadlines contained in this subsection upon

written motion by a party, consistent with any statutory deadlines.” 35 Ill. Adm. Code 101.516(a).

4. Due to the litigation schedule of counsel for the IEPA, the IEPA seeks an extension of time to file its response to January 9, 2015.

5. The Respondent has consulted with the Petitioner on the extension and the Petitioner has no objection to this motion for an extension of time for the Respondent to file its response to Petitioner’s MPSJ.

WHEREFORE, Respondent, the Illinois Environmental Protection Agency, hereby moves the Hearing Officer to enter an order granting this motion for an extension of time, until January 9, 2015 to file its response to Clinton Landfill, Inc.’s Motion for Partial Summary Judgment Regarding Changes to Special Condition Section III.A.2.f (MGP Waste).

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECION AGENCY

By LISA MADIGAN
Attorney General of the State of Illinois

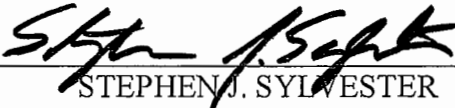
BY:


STEPHEN J. SYLVESTER
JENNIFER A. VAN WIE
Assistant Attorneys General
Environmental Bureau
Illinois Attorney General’s Office
69 W. Washington Street, Suite 1800
Chicago, Illinois 60602
(312) 814-2087
(312) 814-0609
ssylvester@atg.state.il.us
jvanwie@atg.state.il.us

DATE: November 14, 2014

CERTIFICATE OF SERVICE

I, STEPHEN J. SYLVESTER, an attorney, do certify that I caused the Respondent's Unopposed Motion for Extension of Time to File a Response to Clinton Landfill, Inc.'s Motion for Partial Summary Judgment Regarding Changes to Special Condition Section III.A.2.f (MGP Waste) and Notice of Filing in this matter to be served upon the persons listed in the Service List by electronic mail at the listed electronic mail addresses.


STEPHEN J. SYLVESTER

Date: November 14, 2014