Electronic Filing - Received, Clerk's Office : 04/02/2015

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)
Complainant,)))))
Vs.)
ILLINOIS AMERICAN WATER COMPANY, an Illinois corporation	
Respondent.)

PCB No. 2015-155 (Water – Enforcement)

NOTICE OF FILING

 TO: Evan J. McGinley Assistant Attorney General Environmental Bureau Illinois Attorney General's Office 69 W. Washington Street 18th Floor Chicago, IL 60602

PLEASE TAKE NOTICE that on April 2, 2015, I have electronically filed with the Clerk of the Pollution Control Board, a Motion for Extension of Time to Respond to the People of the State of Illinois' Complaint on behalf of the Respondent, Illinois American Water Company, an Illinois corporation, a copy of which is herewith served upon you.

BRYAN CAVE LLP

By:

al s

Dale A. Guariglia, Missouri Bar #32988 Erin L. Brooks, #6311005 211 North Broadway, Suite 3600 St. Louis, MO 63102 Telephone: (314) 259-2000 Telefax: (314) 259-2020

Attorneys for Illinois American Water Company

Electronic Filing - Received, Clerk's Office : 04/02/2015

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,
Complainant,
Vs.
ILLINOIS AMERICAN WATER COMPANY, an Illinois corporation
Respondent.

PCB No. 2015-155 (Water – Enforcement)

MOTION FOR EXTENSION OF TIME TO ANSWER THE PEOPLE OF THE STATE OF ILLINOIS' COMPLAINT

COMES NOW Respondent, Illinois American Water Company ("Respondent") and pursuant to 35 Ill. Admin. Code § 101.522, requests an extension of time to respond to the People of the State of Illinois' ("State of Illinois") Complaint.

1. The State of Illinois filed its Complaint on January 30, 2015, and Respondent was served with the Complaint on February 4, 2015.

2. Respondent respectfully asks the Board to extend the deadline to respond to the Complaint by thirty (30) days until May 6, 2015. The parties to the case are involved in settlement negotiations. The 30-day extension will assist in the furtherance of settlement negotiations. The extension of time will not unduly burden any party to this case.

3. Respondent has corresponded with Counsel for the State of Illinois regarding this request. The State of Illinois has no objection to Respondent having an additional thirty (30) days to respond to the Complaint.

WHEREFORE, Respondent, ILLINOIS AMERICAN WATER COMPANY respectfully asks that the time to respond to the State of Illinois' Complaint be EXTENDED until May 6, 2015. Dated: April 2, 2015

BRYAN CAVE LLP

By:

1 Dal 1. Dale A. Guariglia, Missouri Bar #32988

Erin L. Brooks, # 6311005 One Metropolitan Square 211 North Broadway Suite 3600 St. Louis, MO 63102 Telephone: (314) 259-2000 Telefax: (314) 259-2020

Attorneys for Respondent, Illinois American Water Company

Electronic Filing - Received, Clerk's Office : 04/02/2015

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,
Complainant,
Vs.
ILLINOIS AMERICAN WATER COMPANY, an Illinois corporation
Respondent.

PCB No. 2015-155 (Water – Enforcement)

CERTIFICATE OF SERVICE

Evan J. McGinley Assistant Attorney General Environmental Bureau 69 W. Washington St., Suite 1800 Chicago, IL 60602

Brad Halloran Hearing Officer Illinois Pollution Control Board 1021 North Grand Avenue East Springfield, IL 62794

John Therriault, Clerk Illinois Pollution Control Board James R. Thompson Center 100 West Randolph St., Suite 11-500 Chicago, IL 60601

PLEASE TAKE NOTICE that on April 2, 2015, I electronically filed with the Clerk of the Pollution Control Board, a Motion for Extension of Time to Respond to the People of the State of Illinois' Complaint on behalf of the Respondent, Illinois American Water Company, copies of which are herewith served upon you.

BRYAN CAVE LLP

Dec AT-By: