

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

CLINTON LANDFILL, INC.,)	
)	
Petitioner,)	PCB 2015-060
)	PCB 2015-076
v.)	PCB 2015-111
)	PCB 2015-113
ILLINOIS ENVIRONMENTAL)	PCB 2015-166 (cons.)
PROTECTION AGENCY,)	
)	(Permit Appeals)
Respondent.)	

NOTICE OF ELECTRONIC FILING

TO: All Parties of Record

PLEASE TAKE NOTICE that on May 28, 2015, I filed the following documents electronically with the Clerk of the Pollution Control Board of the State of Illinois:

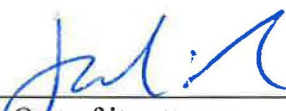
1. Joint Motion to Extend Stay; and
2. This Notice of Electronic Filing

Copies of the above-listed documents were served upon you in the manner stated in the Certificate of Service attached hereto.

Respectfully submitted,

CLINTON LANDFILL, INC.,
Petitioner

By: _____


One of its attorneys

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915-0482

CERTIFICATE OF SERVICE

The undersigned certifies that on May 28, 2015, the foregoing document will be served upon each party to this case in the following manner:

X VIA EMAIL ~~with confirmation by United States Mail~~ ONLY

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By:  _____
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JOINT MOTION TO EXTEND STAY

NOW COMES the Petitioner, CLINTON LANDFILL, INC. (“CLI”), and the Respondent, the ILLINOIS ENVIRONMENTAL PROTECTION AGENCY (the “Agency”), by and through their undersigned attorneys, and as and for their Joint Motion to Extend the Stay in these consolidated cases, PCB 2015-060, PCB 2015-076, PCB 2015-111, PCB 2015-113, and PCB 2015-166 (cons.) (the “Consolidated Case”), state as follows:

1. The Consolidated Case concerns the unilateral modification of Permit No. 2005-070-LF by the Agency on July 31, 2014.
2. CLI and the Agency previously moved for a stay of the Consolidated Case until April 30, 2015, which was granted by the Board.
3. Settlement negotiations between CLI and the Agency are continuing. If these negotiations are successfully concluded, CLI will most likely dismiss the Consolidated Case.
4. CLI and the Agency jointly submit that it is in the interest of efficiency and would aid the parties in resolving these matters for the Board to extend the stay on the proceedings in the Consolidated Case until **June 30, 2015**, at which time, unless the stay is extended by request of the parties, the stay will be lifted.

5. By June 30, 2015, the parties reasonably anticipate that settlement negotiations will most likely have concluded, either successfully or not.

6. CLI will file a deadline waiver to November 6, 2015, which is at least 120 days after June 30, 2015.

7. If the stay is imposed, the parties ask that the Board nevertheless retains on the docket, the telephonic status conference that is presently set for June 16, 2015, at 2:30 p.m., so that the parties can update the Hearing Officer regarding settlement status in advance of June 30, 2015.

8. CLI and the Agency each reserve the right to seek to lift the stay prior to June 30, 2015.

9. CLI and the Agency are filing Joint Motions to Consolidate in PCB 2015-194 and PCB 2015-195, seeking to join PCB 2015-194 and PCB 2015-195 with the Consolidated Case. CLI and the Agency request that the Board (1) rules on the Joint Motions to Consolidate filed in PCB 2015-194 and PCB 2015-195, and (2) if the consolidations are granted, that PCB 2015-194 and PCB 2015-195 thereafter be stayed along with the Consolidated Case.

WHEREFORE, CLI and the Agency jointly request that the Board or the Hearing Officer enter an Order staying the case until **June 30, 2015**, in accordance with the above.

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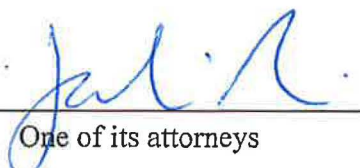
Respectfully submitted,

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CLINTON LANDFILL, INC.,
Petitioner

By: _____


One of its attorneys

ILLINOIS ENVIRONMENTAL PROTECTION
AGENCY,
Respondent

By: _____


One of its attorneys

915-0478

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