

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

CLINTON LANDFILL, INC.,)	PCB 2015-060
)	PCB 2015-076
Petitioner,)	PCB 2015-111
)	PCB 2015-113
v.)	PCB 2015-166
)	PCB 2015-194
ILLINOIS ENVIRONMENTAL)	PCB 2015-195
PROTECTION AGENCY,)	PCB 2015-207 (cons.)
)	
Respondent.)	(Permit Appeals)

NOTICE OF ELECTRONIC FILING

TO: All Parties of Record

PLEASE TAKE NOTICE that on July 23, 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

Brian J. Meginnes, Esq. (bmeginnes@emrslaw.com)
Janaki Nair, Esq. (jnair@emrslaw.com)
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915-0648

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

CLINTON LANDFILL, INC.,)	PCB 2015-060
)	PCB 2015-076
Petitioner,)	PCB 2015-111
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v.)	PCB 2015-166
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ILLINOIS ENVIRONMENTAL)	PCB 2015-195
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Respondent.)	(Permit Appeals)

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, PCB 2015-166, PCB 2015-194, PCB 2015-195, and PCB 2015-207 (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, and then moved for extensions of the stay until June 30, 2015, and then until July 31, 2015, which were also 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 **September 30, 2015**, at which time, unless the stay is extended by request of the parties, the stay will be lifted.

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

6. CLI is filing a deadline waiver to February 29, 2016, which is more than 120 days after September 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 September 24, 2015, at 11:00 a.m., so that the parties can update the Hearing Officer regarding settlement status in advance of September 30, 2015.

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

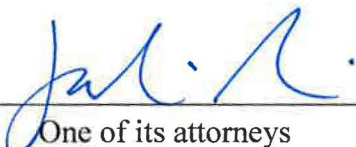
WHEREFORE, CLI and the Agency jointly request that the Board or the Hearing Officer enter an Order staying the case until **September 30, 2015**, in accordance with the above.

[signature page follows]

Respectfully submitted,

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CLINTON LANDFILL, INC.,
Petitioner

By: 
One of its attorneys

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ILLINOIS ENVIRONMENTAL PROTECTION
AGENCY,
Respondent

By: _____
One of its attorneys

915-0647

Respectfully submitted,

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Petitioner

By: _____
One of its attorneys

ILLINOIS ENVIRONMENTAL PROTECTION
AGENCY,
Respondent

By: 
One of its attorneys

915-0647

CERTIFICATE OF SERVICE

The undersigned certifies that on July 23, 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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NOTICE OF ELECTRONIC FILING

TO: All Parties of Record

PLEASE TAKE NOTICE that on July 23, 2015, I filed the following documents electronically with the Clerk of the Pollution Control Board of the State of Illinois:

1. Waiver of the Decision Deadline to February 29, 2016; 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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915-0649

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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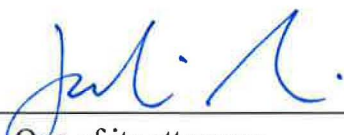
WAIVER OF DECISION DEADLINE TO FEBRUARY 29, 2016

NOW COMES the Petitioner, Clinton Landfill, Inc. ("CLI"), by and through its undersigned attorneys, and as and for its Waiver of the Decision Deadline to February 29, 2016, states as follows:

CLI hereby agrees to waive the decision deadline in this case (*i.e.*, the seven above-listed cases that have been consolidated) until **February 29, 2016**.

Respectfully submitted,

CLINTON LANDFILL, INC.,
Petitioner

By: 
One of its attorneys

Brian J. Meginnes, Esq. (bmeginnes@emrslaw.com)
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Stephen Sylvester, Esq., Assistant Attorney General
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