BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,	)	
	)	
Complainant,	)	
	)	
v.	)	PCB No. 15-112
	)	(Enforcement – Air)
INCOBRASA INDUSTRIES, LTD.,	)	
an Illinois corporation,	)	
	)	
Respondent.	)	

NOTICE OF ELECTRONIC FILING

To: **By U.S. Mail**
LaDonna Driver
Edward Dwyer
HeplerBroom LLC
3150 Roland Ave.
PO Box 5776
Springfield, IL 62703-5776

PLEASE TAKE NOTICE that on February 19, 2016, the Complainant in the above-captioned matter electronically filed with the Office of the Clerk of the Pollution Control Board Complainant's Motion for Extension of Deadline to Respond to Discovery Requests, a copy of which is attached hereto and hereby served upon you.

PEOPLE OF THE STATE OF ILLINOIS,
by LISA MADIGAN, Attorney General
of the State of Illinois

By: _____
Ryan G. Rudich
Assistant Attorney General
Environmental Bureau
69 W. Washington St., 18th Floor
Chicago, IL 60602
(312) 814-1511
rrudich@atg.state.il.us

DATE: February 19, 2016

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,	)	
	)	
Complainant,	)	
	)	
v.	)	PCB No. 15-112
	)	(Enforcement – Air)
INCOBRASA INDUSTRIES, LTD.,	)	
an Illinois corporation,	)	
	)	
Respondent.	)	

COMPLAINANT'S MOTION FOR EXTENSION OF DEADLINE TO RESPOND TO DISCOVERY REQUESTS

NOW COMES COMPLAINANT, People of the State of Illinois, by LISA MADIGAN, Attorney General of the State of Illinois, pursuant to Section 101.522 of the Illinois Pollution Control Board's ("Board") procedural rules, 35 Ill. Adm. Code 101.522, and respectfully moves the Hearing Officer for an Order extending the deadline for the parties to respond to outstanding discovery requests to March 31, 2016. In support of this motion, the Complainant states as follows:

1.   On December 7, 2015, the Hearing Officer issued an Order requiring the parties to serve initial discovery requests by January 8, 2016 and respond to those discovery requests by February 29, 2016.

2.   Both parties served each other with document requests and interrogatories on or before January 8, 2016.

3.   Section 101.522 of the Board's procedural 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.

4.   Complainant has been actively working to prepare responses to Respondent's discovery requests and documents for production to Respondent and this motion is not brought for purposes of delay.
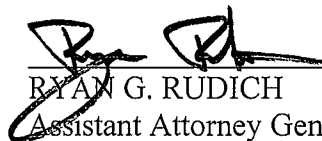
5.   This motion is Complainant's first request for an extension of time in this matter.

6.   Respondent's counsel has represented that Respondent does not object to this motion.

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests the Hearing Officer enter an Order granting this motion, extending the deadline for the parties to respond to outstanding discovery requests until March 31, 2016, and granting such other relief as the Hearing Officer deems proper.

PEOPLE OF THE STATE OF ILLINOIS
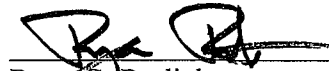by LISA MADIGAN, Attorney
General of the State of Illinois

By: _____
RYAN G. RUDICH
Assistant Attorney General
Environmental Bureau
Illinois Attorney General's Office
69 W. Washington Street, Suite 1800
Chicago, Illinois 60602
(312) 814-1511

CERTIFICATE OF SERVICE

I, Ryan G. Rudich, an Assistant Attorney General, certify that on the 19th day of February, 2016, I caused to be served by U.S. Mail the foregoing Notice of Electronic Filing and Complainant's Motion for Extension of Deadline to Respond to Discovery Requests on LaDonna Driver and Edward Dwyer at the address listed on the Notice of Electronic Filing, by depositing same in postage prepaid envelopes with the United States Postal Service located at 100 West Randolph Street, Chicago, Illinois 60601.

Ryan G. Rudich
Assistant Attorney General
Environmental Bureau
Illinois Attorney General's Office
69 W. Washington Street, Suite 1800
Chicago, Illinois 60602
(312) 814-1511