

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

PEOPLE OF THE STATE OF ILLINOIS,	)	
	)	
Complainant,	)	
	)	
v.	)	PCB 11-79
	)	(Enforcement-Water)
INVERSE INVESTMENTS L.L.C.,	)	
an Illinois limited liability company,	)	
	)	
Respondent.	)	

**NOTICE OF FILING**


To: Jennifer T. Nijman  
Nijman Franzetti LLP  
10 S. LaSalle Street  
Suite 3600  
Chicago, IL 60603

Bradley P. Halloran  
Hearing Officer  
Illinois Pollution Control Board  
James R. Thompson Center, Suite 11-500  
100 W. Randolph Street  
Chicago, IL 60601  
*Brad.Halloran@Illinois.gov*

PLEASE TAKE NOTICE that on the 25th day of March, 2016, the Plaintiff, PEOPLE OF THE STATE OF ILLINOIS, filed a Response to Respondent's Motion to Stay, a true and correct copy of which is attached hereto and is hereby served upon you.

PEOPLE OF THE STATE OF ILLINOIS,  
*ex rel.* LISA MADIGAN, Attorney General  
of the State of Illinois

By:

  
Kathryn A. Pamenter  
Assistant Attorney General  
Environmental Bureau  
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**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

PEOPLE OF THE STATE OF ILLINOIS, )  
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Complainant, )  
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v. ) PCB 11-79  
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INVERSE INVESTMENTS, L.L.C., )  
an Illinois limited liability company, )  
)  
Respondent. )

**COMPLAINANT'S RESPONSE TO RESPONDENT'S MOTION TO STAY**

NOW COMES Complainant, PEOPLE OF THE STATE OF ILLINOIS, ex rel. LISA MADIGAN, Attorney General of the State of Illinois ("People or "Complainant"), and responds to Inverse Investments, L.L.C.'s ("Respondent") Motion to Stay. In support of this response, the People state as follows:

1. On March 8, 2016, Respondent filed a Motion to Stay, seeking a four-month stay of the above-referenced case.

2. As Respondent recognized in its Motion, to date, the United States Environmental Protection Agency ("USEPA") has completed the water main extension project and corresponding hook-up of certain residential homes to the municipal water supply near Respondent's property located at 3004 West Route 120 (Elm Street), McHenry County, Illinois (the "Site").

3. Complainant contends that Respondent must complete additional sampling and remedial work at the Site.

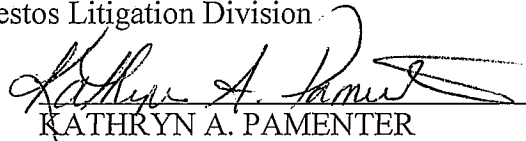
4. Complainant does not object to Respondent's request for an additional stay so that the parties may engage in settlement negotiations of this enforcement action, provided that the length of the stay is no longer than two (2) months.

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, does not object to a stay of PCB No. 11-79 for no longer than two (2) months to engage in settlement negotiations.

PEOPLE OF THE STATE OF ILLINOIS,  
*ex rel.* LISA MADIGAN, Attorney  
General of the State of Illinois

MATTHEW J. DUNN, Chief  
Environmental Enforcement /  
Asbestos Litigation Division

By:




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**CERTIFICATE OF SERVICE**

I, Kathryn A. Pamenter, an Assistant Attorney General, do certify that I caused to be served this 25th day of March, 2016, the foregoing Complainant's Response to Respondent's Motion to Stay to (a) Jennifer T. Nijman by first class mail in a postage pre-paid envelope and depositing same with the United States Postal Service located at 100 West Randolph Street, Chicago, Illinois at or before the hour of 5:00 p.m. and (b) Bradley P. Halloran via email.

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Hearing Officer  
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Kathryn A. Pamenter