

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

PEOPLE OF THE STATE OF ILLINOIS, )  
 by LISA MADIGAN, Attorney )  
 General of the State Illinois, )  
 )  
 )  
 Complainant, )  
 )  
 v. )  
 )  
 INVERSE INVESTMENTS L.L.C., )  
 an Illinois limited liability company, )  
 )  
 Respondent. )  
 )

PCB No. 11-79

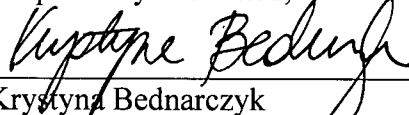
**NOTICE OF FILING**

TO: Bradley P. Halloran  
 Hearing Officer  
 Illinois Pollution Control Board  
 100 West Randolph St., Suite 11-500  
 Chicago, IL 60601

Jennifer T. Nijman  
 NIJMAN FRANZETTI LLP  
 10 S. LaSalle St., Suite 3600  
 Chicago, IL 60603

PLEASE TAKE NOTICE that I have electronically filed today with the Office of the Clerk of the Pollution Control Board Complainant's MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO RESPONDENT'S MOTION TO DISMISS AND MEMORANDUM IN SUPPORT OF ITS MOTION TO DISMISS, a copy of which is served upon you.

Respectfully submitted,



\_\_\_\_\_  
 Krystyna Bednarczyk  
 Assistant Attorney General

Office of the Illinois Attorney General  
 Environmental Bureau  
 69 West Washington Street, Suite 1800  
 Chicago, Illinois 60602  
 (312) 814-1511

Date: September 27, 2011

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

PEOPLE OF THE STATE OF ILLINOIS, )  
by LISA MADIGAN, Attorney )  
General of the State Illinois, )  
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Complainant, )  
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INVERSE INVESTMENTS L.L.C., )  
an Illinois limited liability company, )  
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Respondent. )  
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PCB No. 11-79

**MOTION FOR EXTENSION OF TIME TO FILE RESPONSE  
TO RESPONDENT'S MOTION TO DISMISS AND RESPONDENT'S  
MEMORANDUM IN SUPPORT OF ITS MOTION TO DISMISS**

Complainant, PEOPLE OF THE STATE OF ILLINOIS ("People") respectfully moves the Illinois Pollution Control Board ("Board"), pursuant to 35 Ill. Adm. Code 101.500(d), to extend the time for filing the Complainant's Response to Respondent's Motion to Dismiss and Respondent's Memorandum in Support of Its Motion to Dismiss. In support thereof, the People state as follows:

1. On May 4, 2011, the Office of the Illinois Attorney General, on behalf of the People of the State of Illinois, filed a Complaint with the Illinois Pollution Control Board. The Complaint was served on the representative of Inverse Investments L.L.C ("Inverse") on or about May 5, 2011.
2. All motions to dismiss any pleading were to be filed within 30 days after service, and the answer to the Complaint was due June 5, 2011.

3. On June 1, 2011, Inverse filed an Agreed Motion for Extension of Time to file responsive motions until July 5, 2011.

4. On June 27, 2011, Inverse filed a second, Agreed Motion for Extension of Time to file responsive motions until August 4, 2011.

5. On July 28, 2011, the Board, through Hearing Officer Bradley Halloran, granted Inverse an additional 45 days to file responsive pleadings. Respondent's answer or other pleadings were due on or before September 21, 2011.

6. On September 21, 2011, Inverse filed Respondent's Motion to Dismiss and Respondent's Memorandum in Support of Its Motion to Dismiss.

7. Pursuant to 35 Ill. Adm. Code 101.500(d), a party may file a response to a motion within 14 days after service of a motion. If no response is filed, the party will be deemed to have waived objection to the granting of the motion. The People's response to Respondent's Motion to Dismiss is due on October 5, 2011.

8. The People is extremely mindful of the Board's desire to manage its docket and timely adjudicate matters pending before it. Respondent's motion and memorandum cite extensive statutory and case law and are supported by affidavits. Due to the time required for Complainant to research and brief its legal arguments and to draft counter-affidavits, additional time is needed. In order to respond to the motion, Complainant requests an extension of time, beyond October 5, 2011.

9. Inverse will not be prejudiced by the granting of additional time to respond.


WHEREFORE, the People respectfully request the Board to extend the time for filing the Complainant's Response to Respondent's Motion to Dismiss and Complainant's Memorandum

in Support of its Reply to Respondent's Motion to Dismiss for an additional 30 days, or until  
November 7, 2011.

Respectfully submitted,

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

By:

  
\_\_\_\_\_  
KRYSTYNA BEDNARCZYK  
Assistant Attorney General  
Office of the Illinois Attorney General  
Environmental Bureau  
69 West Washington Street, Suite 1800  
Chicago, IL 60602  
(312) 814-8567

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

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 Respondent. )  
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PCB No. 11-79

**CERTIFICATE OF SERVICE**

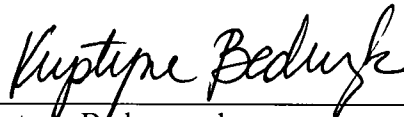
I, the undersigned attorney at law, hereby certify that on September 27, 2011, I served true and correct copies of Complainant's MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO RESPONDENT'S MOTION TO DISMISS AND RESPONDENT'S MEMORANDUM IN SUPPORT OF ITS MOTION TO DISMISS, upon the persons and by the methods as follows:

***[Electronic filing]***

***[First Class U.S. Mail]***

TO: John T. Therriault  
 Assistant Clerk  
 Illinois Pollution Control Board  
 100 West Randolph St., Suite 11-500  
 Chicago, IL 60601

Jennifer T. Nijman  
 NIJMAN FRANZETTI LLP  
 10 S. LaSalle St., Suite 3600  
 Chicago, IL 60603




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Date: September 27, 2011