

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS )  
)  
Complainant, )  
)  
v. )  
)  
KEHRER BROTHERS CONSTRUCTION )  
INC., an Illinois corporation )  
)  
Respondent. )

RECEIVED  
CLERK'S OFFICE  
AUG 01 2012  
STATE OF ILLINOIS  
Pollution Control Board  
PCB NO. 2012-132  
(Enforcement - Land)

ORIGINAL  
RETURN TO CLERK'S OFFICE

**CONSENT MOTION FOR EXTENSION  
OF TIME TO FILE RESPONSIVE PLEADING**

Respondent Kehrer Brothers Construction, Inc. ("Kehrer Brothers"), by and through their undersigned counsel, pursuant to 35 ILL. ADMIN. CODE §101.522, moves the Hearing Officer and Board with consent of Plaintiff State of Illinois for an additional thirty (30) day extension of time, up to and including, September 6, 2012, to file its responsive pleading to the State of Illinois' Complaint. Respondent Kehrer Brothers does not bring this Motion for purposes of delay. Below signed counsel has recently been engaged in this matter and requests additional time to respond to the Complaint.

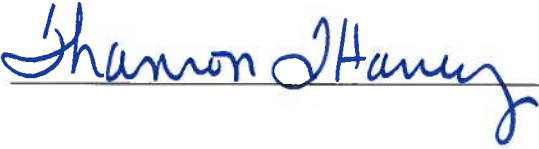
GREENSFELDER, HEMKER & GALE, P.C.

By: Shannon Haney  
Richard E. Greenberg, pro hac vice submitted  
[reg@greensfelder.com](mailto:reg@greensfelder.com)  
Shannon L. Haney, No. 06284858  
[slh@greensfelder.com](mailto:slh@greensfelder.com)  
10 South Broadway, Suite 2000  
St. Louis, MO 63102  
(314) 241-9090  
(314) 345-4792 FAX

**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing document was served upon the attorney set forth below, by enclosing same in an envelope addressed to said attorney, with first-class postage thereon fully prepaid and by depositing said envelope in a U.S. Post Office mailbox in St. Louis, Missouri, on the 30<sup>th</sup> day of July, 2012.

Raymond J. Callery  
Assistant Attorney General  
500 South Second Street  
Springfield, Illinois 62706

  
\_\_\_\_\_

**Shannon L. Haney**  
**Direct Dial 314/345-4779**  
**Direct Fax 314/345-4792**

July 30, 2012

**RECEIVED**  
**CLERK'S OFFICE**  
**AUG 01 2012**  
**STATE OF ILLINOIS**  
**Pollution Control Board**

Pollution Control Board, Attn: Clerk  
100 West Randolph Street  
James R. Thompson Center, Suite 11-500  
Chicago, Illinois 60601-3218

**Re: State of Illinois v. Kehrer Brothers Construction, Inc.**  
**PCB No. 2012-132**  
**(Enforcement – Land)**

Dear Clerk:

Enclosed for filing please find an original and nine (9) copies of our Consent Motion for Extension of Time to File Responsive pleading and Proposed Order in the above-captioned matter. Please return a file-stamped copy to the undersigned in the enclosed self-addressed stamped envelope.

Thank you for your assistance in this matter.

Sincerely,

GREENSFELDER, HEMKER & GALE, P.C.

By



Shannon L. Haney

SLH/seh  
Enclosures  
1360812