

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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

ORIGINAL
RETURN TO CLERK'S OFFICE

PCB NO. 2012-132
(Enforcement - Land)

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STATE OF ILLINOIS
Pollution Control Board

**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, December 7th, 2012, to file its responsive pleading to the State of Illinois' Complaint. Respondent Kehrer Brothers does not bring this Motion for purposes of delay, but seeks additional time to continue settlement discussions with the State of Illinois.

GREENSFELDER, HEMKER & GALE, P.C.

By: Shannon L. Haney
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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing document was served upon the attorney set forth below, by electronic mail and 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 7th day of November, 2012.

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

Shannon Honey



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November 7, 2012

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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 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
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