

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,) AC 12-51
)
Complainant,)
) (IEPA No. 87-12-AC)
v.)
)
NORTHERN ILLINOIS)
SERVICE COMPANY,)
)
Respondent.)

NOTICE OF FILING

TO: John T. Therriault (EMAILED AND MAILED)
Assistant Clerk
Illinois Pollution Control Board
100 West Randolph Street, Suite 11-500
Chicago, IL 60601-3218

Bradley P. Halloran
Hearing Officer
Illinois Pollution Control Board
100 West Randolph Street, Suite 11-500
Chicago, IL 60601-3218

Scott B. Sievers
Special Assistant Attorney General
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

PLEASE TAKE NOTICE that I have electronically filed with the Office of the Clerk of the Pollution Control Board the Motion for Leave to Allow Extension of Time in which to Respond to Complainant's Motion for Leave to File an Amended Administrative Citation of NORTHERN ILLINOIS SERVICE COMPANY, Respondent herein, a copy of which is herewith served upon you.

NORTHERN ILLINOIS SERVICE COMPANY,
Respondent,

By Peter DeBruyne, P.C.

By 

Peter DeBruyne, Its Attorney

Peter DeBruyne
Peter DeBruyne, P.C.
838 North Main Street
Rockford, IL 61103
Telephone (815) 964-3810
Fax (815) 964-3813
Email: pdebruyne@sbcglobal.net

CERTIFICATE OF SERVICE

Peter DeBruyne hereby certifies that he has served a copy of the foregoing MOTION OF FILING upon:

John T. Therriault (EMAILED AND MAILED)
Assistant Clerk
Illinois Pollution Control Board
100 West Randolph Street, Suite 11-500
Chicago, IL 60601-3218

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Scott B. Sievers
Special Assistant Attorney General
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Springfield, IL 62794-9276

By enclosing true copies thereto to the addresses referred to above in envelopes duly addressed bearing proper first class postage and deposited in the United States mail at Rockford, Illinois, on January 3, 2012.



Peter DeBruyne

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ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY,)	AC 12-51
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Complainant,)	
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NORTHERN ILLINOIS)	
SERVICE COMPANY,)	
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**MOTION FOR LEAVE TO ALLOW EXTENSION OF TIME
IN WHICH TO RESPOND TO COMPLAINANT’S MOTION FOR
LEAVE TO FILE AN AMENDED ADMINISTRATIVE CITATION**

NOW COMES the respondent, NORTHERN ILLINOIS SERVICE COMPANY, by its attorney, Peter DeBruyne, P.C., and moves this honorable Board to allow an extension of time of 14 days, or until January 25, 2013 to file a Response to the Motion. In support of this request, Respondent states:

1. Respondent’s counsel is engaged in preparing a reply brief in James Toole v. Executive Travel, Inc., Bruce Hagshenas, Cathy Carter-Cyrs, and Minoo Hagshenas, Case No. 2-12-0438, Appellate Court of Illinois;
2. Respondent’s counsel is engaged in preparation for and a trial on January 8 – 9, 2013 in the case of Secretary of Labor v. Northern Illinois Service Company, Docket No. LAKE 2011-1029M and Secretary of Labor v. Northern Illinois Service Company, Docket No. LAKE 2012-161M.

WHEREFORE, respondent respectfully requests an extension of time in which to respond to complainant’s Motion until January 17, 2013.

NORTHERN ILLINOIS SERVICE COMPANY,
Respondent,

By Peter DeBruyne, P.C.

By 
Peter DeBruyne, Its Attorney

Peter DeBruyne
Peter DeBruyne, P.C.
838 North Main Street
Rockford, IL 61103
Telephone (815) 964-3810
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Email: pdebruyne@sbcglobal.net

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Peter DeBruyne