

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

PEOPLE OF THE STATE OF ILLINOIS,	)	
Complainant,	)	
v.	)	PCB No. 12-21
	)	(Enforcement - -Land)
ALTIVITY PACKAGING, LLC,	)	
a Delaware limited liability company	)	
INTRA-PLANT MAINTENANCE	)	
CORPORATION, an Illinois corporation,	)	
IRONHUSTLER EXCAVATING, INC.,	)	
an Illinois corporation, and	)	
RON BRIGHT, d/b/a Quarter Construction,	)	
	)	
Respondents.	)	

**NOTICE OF ELECTRONIC FILING**

To: See Attached Service List

PLEASE TAKE NOTICE that on February 26, 2013, I electronically filed with the Office of Clerk of the Pollution Control Board a MOTION FOR EXTENSION OF TIME on behalf of Respondents IRONHUSTLER EXCAVATING, INC., and RON BRIGHT, d/b/a Quarter Construction, a copy of which is herewith served upon you.

Respectfully submitted,

    \s\Thomas J. Immel  
Thomas J. Immel  
Feldman Wasser Draper & Cox  
PO Box 2418  
1307 South Seventh Street  
Springfield, Illinois 62705  
(217) 544-3403

[timmel@feldman-wasser.com](mailto:timmel@feldman-wasser.com)

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IRONHUSTLER EXCAVATING, INC.,	)	
an Illinois corporation, and	)	
RON BRIGHT, d/b/a Quarter Construction,	)	
	)	
Respondents.	)	

**MOTION FOR EXTENSION OF TIME**

NOW COMES Respondents, IRONHUSTLER EXCAVATING, INC., an Illinois corporation, and RON BRIGHT, d/b/a Quarter Construction, for their Motion for Extension of Time to file Respondents' Answer and Objection to Complainant's Motion for Summary Judgment, states as follows:

1. Respondent's Answer and Objection to Complainant's Motion for Summary Judgment is due on February 28, 2013.
2. The undersigned attorney has been unable to complete the drafting of Respondent's Answer and Objection to Complainant's motion for Summary Judgment due to the crush of professional responsibilities and court proceedings.
3. The undersigned attorney has been in contact with the attorney for Complainant, who encouraged the filing of the instant motion.

4. The granting of this motion will not prejudice the Complainant; and is made in good faith, and not for purposes of delay

WHEREFORE, Respondents pray that this Motion for Extension of Time be granted and Respondents be given to and including March 28, 2013, to file their Answer and Objections to Complainant's Motion for Summary Judgment.

\s\ Thomas J. Immel  
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Certificate of Service

The undersigned hereby certifies that a copy of the foregoing Motion for Extension of Time to File has been served upon the persons to whom it is directed by placing the same in a sealed envelope, addressed as indicated, with postage fully prepaid and by depositing the same in the United States mail at Springfield, Illinois this 26<sup>th</sup> day of February, 2013:

Raymond J. Callery  
Assistant Attorney General  
Environmental Enforcement Bureau  
Office of the Illinois Attorney General  
500 South Second Street  
Springfield, Illinois 62706

William O'Neal  
Winston & Strawn  
35 West Wacker Drive  
Suite 4200  
Chicago, IL 60601-9703

Charles M. Rock  
Hassellberg Rock Bell & Kuppler, LLP  
4600 North Brandywine Dr.  
Suite 200  
Peoria, IL 61614

\s\Thomas J. Immel

**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that a copy of the foregoing Notice of Electronic Filing and Answer has been served upon the following persons by placing the same in a sealed envelope, addressed as stated, with First Class postage fully prepaid and by depositing the same in the United States mail at Springfield, Illinois this 26<sup>th</sup> day of February, 2013:

Charles M. Rock  
Hassellberg Rock Bell & Kuppler, LLP  
4600 North Brandywine Dr.  
Suite 200  
Peoria, IL 61614

Raymond Callery, AAG – Environmental  
Office of the Illinois Attorney General  
500 South Second Street  
Springfield, IL 62706

Charles Rock, Esq.  
Hasselberg Rock Bell & Kuppler  
Associated Bank Building, Suite 200  
4600 N. Brandywine Drive  
Peoria, IL 61614

and electronically filed with the Clerk of the Pollution Control Board on the same date.

\s\ Thomas J. Immel

Thomas J. Immel, Reg, # 1301209