Electronic Filing - Received, Clerk's Office: 04/30/2015

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)	
Complainant,)	
vs.)	PCB No. 2015-155 (Water – Enforcement)
ILLINOIS AMERICAN WATER COMPANY, an Illinois corporation,)	(water – Emoreement)
Respondent.)	

CONSENT MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING

Respondent Illinois American Water Company, by and through its undersigned attorneys and with the assent of counsel for Complainant People of the State of Illinois (the "State"), hereby moves for an extension of the deadline to answer or file a responsive pleading to the Complaint. Illinois American Water Company states as follows:

- 1. The State filed its Complaint against Illinois American Water Company on January 30, 2015.
- 2. Per Hearing Board Officer order entered April 7, 2015, Illinois American Water Company's current deadline to file a responsive pleading is May 11, 2014.
- 3. Illinois American Water Company and the State are engaged in on-going settlement negotiations.
- 4. The parties request an extension of time for 45 days, up to and through June 25, 2015, for Illinois American Water Company to file an answer or other responsive pleading to the Complaint, so that they parties may continue settlement discussion.
- 5. Counsel for the State has consented to this request for an extension up to and through <u>June 25, 2015</u>.

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WHEREFORE, Illinois American Water Company respectfully requests this Court grant an extension to file a responsive pleading to the Complaint, such that a responsive pleading is due on or before <u>June 25, 2015</u>.

Respectfully submitted,

BRYAN CAVE LLP

By: Erin L. Brooks
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Erin L. Brooks, IL Bar # 6311005
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St. Louis, MO 63102
Telephone: (314) 259-2000

Attorneys for Respondent
Illinois American Water Company

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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

NOTICE	E EII INC	
Respondent.)	
<u> </u>	(
an Illinois corporation)	
•	,	
ILLINOIS AMERICAN WATER COMPANY,)	
)	(Water – Enforcement)
151	,	
VS.)	PCB No. 2015-155
Complainant,)	
*	,	
PEOPLE OF THE STATE OF ILLINOIS,)	

TO: Evan J. McGinley Assistant Attorney General Environmental Bureau Illinois Attorney General's Office 69 W. Washington Street 18th Floor Chicago, IL 60602

> Brad Halloran Hearing Officer Illinois Pollution Control Board 1021 North Grand Avenue East Springfield, IL 62794

John Therriault, Clerk Illinois Pollution Control Board James R. Thompson Center 100 West Randolph St., Suite 11-500 Chicago, IL 60601

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Pollution Control Board, the Consent Motion for An Extension to File A Responsive Pleading, copies of which are herewith served upon you.

BRYAN CAVE LLP

By: Erin L. Brooks

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Attorneys for Respondent Illinois American Water Company