BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,	)	
	)	
Complainant,	)	
	)	
v.	)	PCB No. 12-035
	)	(Enforcement – Water)
SIX M. CORPORATION Inc., an Illinois,	)	
corporation, WILLIAM MAXWELL, and	)	
MARILYN MAXWELL,	)	
	)	
Respondents.	)	
	)	
and	)	
	)	
JAMES MCILVANIE,	)	
	)	
Necessary Party.	)	

NOTICE OF ELECTRONIC FILING

PLEASE TAKE NOTICE on Monday, August 8, 2016, I caused to be filed with the Clerk of the Illinois Pollution Control Board, via the "COOL" System, the attached Joint Motion for Extension of Time for Discovery.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS,
LISA MADIGAN
Attorney General of the State of Illinois

MATTHEW J. DUNN, Chief
Environmental Enforcement/Asbestos
Litigation Division

BY: _____

SAMMY DAVID
Environmental Bureau
Assistant Attorney General
69 West Washington Street, 18th Floor
Chicago, Illinois 60602
(312) 814-3816
sdavid@atg.state.il.us

CERTIFICATE OF SERVICE

I, Sammy David, served on this day, Monday, August 8, 2016, the attached Joint Motion for Extensions of Time for Discovery, via email to all parties of record.

BY:_____

SAMMY DAVID
Environmental Bureau
Assistant Attorney General
69 West Washington Street, 18th Floor
Chicago, Illinois 60602
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SIX M. CORPORATION, INC., an Illinois,	)	
corporation, and WILLIAM MAXWELL,	)	
	)	
Respondents,	)	
	)	
and	)	
	)	
JAMES MCILVAIN,	)	
	)	
Necessary Party.	)	

JOINT MOTION FOR EXTENSIONS OF TIME FOR DISCOVERY

Complainant, People of the State of Illinois, Respondents Six M. Corporation, Inc. and William Maxwell, and Necessary Party James McIlvain (collectively, "the parties"), by their undersigned counsel, respectfully move the Illinois Pollution Control Board ("Board") for an order to extend the discovery schedule imposed by the Board Order entered on June 2, 2016. In support thereof, the parties state:

1.   On June 2, 2016, the Board issued an Order setting the discovery schedule, whereby responses to all written discovery, except requests to admit, were to be completed by August 17, 2016.

2.   The parties are in the process of responding to remaining written discovery requests and are in agreement that the August 17, 2016 deadline for submitting the responses should be extended.

3.   Thus, the parties seek an extension of the deadline by which they shall submit responses to all written discovery to September 1, 2016.

4.   Because the parties seek to extend the deadline by which they shall submit responses to all written discovery, the parties propose changing the discovery schedule to the following:

    1.   All responses to written discovery due September 1, 2016.
    2.   Final expert witness disclosure September 1, 2016.
    3.   Requests to admit to be served by September 16, 2016.
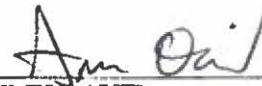   4.   Oral discovery completed, and discovery closed by November 15, 2016.

5.   This request is made in good faith and not for the purpose of unnecessary delay.

Additionally, the extension requested will not prejudice the claims or defenses of any party.

    WHEREFORE, the People of the State of Illinois, Six M. Corporation, Inc. and William Maxwell, and James McIlvain, respectfully request that the Board enter an order extending the discovery schedule.
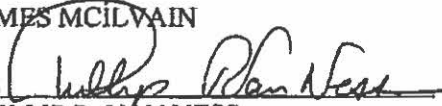
Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS

By: _____
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Attorney for Complainant

SIX M CORPORATION and WILLIAM MAXWELL

By: _____
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JAMES MCILVAIN

By: _____
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