

FOR THE ILLINOIS POLLUTION CONTROL

SUSAN M. BRUCE,)
)
Complainant,)
)
v.) No. PCB 15-139
)
HIGHLAND HILLS SANITARY DISTRICT,)
)
Respondent.)

MOTION FOR EXTENSION OF TIME

Complainant, Susan M. Bruce, by Lawrence A. Stein of ARONBERG GOLDGEHN DAVIS & GARMISA, moves for extensions of time of to serve her interrogatories and request for production of documents respond to the respondent's motion to quash. In support of her motion, complainant states as follows:

1. The complainant was due to serve her interrogatories and requests for production by February 16, 2016 and to respond to the respondent's motion to quash by February 26, 2016.

2. The complainant emailed to counsel for the respondent her interrogatories and requests for production of documents after 5 pm on February 16, 2016, and emailed her objection to the respondent's motion to quash after 5 pm on February 26, 2016

3. Respondent objected to being served by email, and contends the interrogatories and request for production of documents are ineffective for lack of timely and proper service.

4. Complainant is mailing to respondent's counsel simultaneously with the filing of this motion copies of her interrogatories, requests for production, and her response to the motion to quash.

5. The reason for the tardiness of the interrogatories, request for production of documents, and response to the motion to quash is that the complainant's counsel was laboring

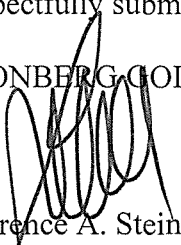
under the incorrect assumption that emailing those documents on the day they were due, but after 5 pm, would be timely.

6. The complainant submits that her counsel's misunderstanding constitutes good and sufficient cause to extend the time to render timely her prior service of her interrogatories and requests for production of documents, and her service and filing of her response to the motion to quash.

WHEREFORE, complainant, Susan M. Bruce, requests an order extending the time for her to serve her interrogatories and requests for production of documents, and her filing and service of her response to the motion to quash to render them timely, and for all of the relief deemed appropriate under the circumstances.

Respectfully submitted,

ARONBERG GOLDGEHN DAVIS & GARMISA


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CERTIFICATE OF FILING AND SERVICE

I, LAWRENCE A. STEIN, certify under penalty of perjury on this 29th day of February 2016, as follows:

1. I served this *Motion for an Extension of Time* by placing an accurate copy of it an envelope with proper first class postage prepaid and plainly addressed to Joseph R. Podlewski, Jr., Esq. and Heidi Hanson, Esq., Podlewski & Hanson, P.C., 4721 Franklin Avenue, Suite 1500, Western Springs, IL 60558-1720.

2. I served the complainant's interrogatories, request for production of documents, and response to motion to quash by placing them in the same envelope.

3. I deposited the envelope in the United States mail in Chicago on February 29, 2016, before 5 pm.

