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## **BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

| PEOPLE OF THE STATE OF ILLINOIS,      | ) |                     |
|---------------------------------------|---|---------------------|
| By Kwame Raoul, Attorney General      | ) |                     |
| of the State of Illinois,             | ) |                     |
| Complainant,                          | ) |                     |
|                                       | ) | PCB No. 29-91       |
|                                       | ) | (Enforcement – Air) |
| <b>v.</b>                             | ) |                     |
| ROCHELLE ENERGY, LLC,                 | ) |                     |
| a Delaware limited liability company, | ) |                     |
| Respondent.                           | ) |                     |

## **Unopposed Motion to Extend Time To Answer**

Now Comes Rochelle Energy, LLC, by counsel, William J. Anaya of Greensfelder, Hemker & Gale, PC, and moves the Board to extend Respondent's time to answer in this cause to November 3, 2023. In furtherance, movant states as follows:

- 1. Counsel for the State of Illinois has tendered to Respondent a proposed stipulation to settle the dispute described in the Complaint in this action.
- 2. Complainant and Respondent intend to pursue settlement negotiations provided that Respondent is not required to answer or otherwise plead until November 3, 2023.
- 3. Complainant has no objection to extending Respondent's time to answer in order to allow the parties adequate time to negotiate settlement.

WHEREFORE, Movant prays that the Hearing Officer enter an order providing Respondent until November 3, 2023, and schedule a status hearing on or about November 3, 2023.

Respectfully submitted,

Rochelle Energy LLC

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4887-0453-9773, v. 1