

**STATE OF ILLINOIS
POLLUTION CONTROL BOARD**

Stanley Boyd, et al., individually, and on behalf of all others similarly situated,)	
)	
Complainants,)	PCB No. 25-052
)	(Enforcement – Public Water Supply)
v.)	
)	
AQUA ILLINOIS, INC., an Illinois corporation,)	
)	
Respondent.)	

COMPLAINANTS’ MOTION FOR AN EXTENSION TO RESPOND TO RESPONDENT’S MOTION TO DISMISS

Complainants Stanley Boyd, Mary Buchanan, Lionell Clark, James Cole, Joan Cross, Chandra DeVance, Ellaray Edwards, Katrina Fox, Patricia Fynn, Annie Haywood, Joann Henderson, Gregory Hightower, Mohammad Iqbal, Linda Jacobs, Sonia Jeniks, Adrienne Jordan, Joseph Lovelace, Ryan Magruder, Kanika McDonald, Melveria Montgomery, Myrtis Neal, Sean Pettiford, Ruth Redmon, Lilleta Rogers, John Schuricht, Brittany Snipes, Davonia Sorrell, John Sydnor, Linda Towner, Lisa Welcher-Silmon, Tika Westerfield, Tara Winters, and Jeanetta Wright (collectively, “Complainants”), individually, and on behalf of all others similarly situated, by and through counsel at Zimmerman Law Offices, P.C., and pursuant to 35 Ill.Adm.Code 101.500(d) and 35 Ill.Adm.Code 101.522, request an extension of time to respond to Respondent Aqua Illinois, Inc.’s (“Respondent”) *Motion to Dismiss Class Action Complaint* (“Motion to Dismiss”), as follows:

Complainants filed their Class Action Complaint (“Complaint”) on March 14, 2025. Respondent filed its Motion to Dismiss on April 17, 2025. Pursuant to 35 Ill.Adm.Code

101.500(d), Complainants' response to the Motion to Dismiss ("Response") is currently due to be filed on or before May 1, 2025.

Complainants seek an additional 14 days to file their Response due to a congested calendar and commitments in other matters, including seeking relief on an emergency basis in the matter of *Wright v. United Airlines*, No. 24-cv-00069 (N.D. Ill.) and preparing for an upcoming trial in the matter of *Department of Financial and Professional Regulation v. King*, No. 2020-01459 (IDFPR). In addition, the principal drafter of Complainants' Response, Matthew C. De Re, recently had surgery and has been working in a limited capacity while recovering. As such, there is good cause for the requested extension.

WHEREFORE, Complainants pray that this tribunal grant them a 14-day extension of time to file their Response to Respondent's Motion to Dismiss—such that the Response would be due on or before May 15, 2025—and provide any further relief deemed just and appropriate under the circumstances.

Respectfully submitted,

By: s/ Thomas A. Zimmerman, Jr.
Thomas A. Zimmerman, Jr.
tom@attorneyzim.com
Sharon A. Harris
sharon@attorneyzim.com
Matthew C. De Re
matt@attorneyzim.com
Jeffrey D. Blake
jeff@attorneyzim.com
ZIMMERMAN LAW OFFICES, P.C.
77 W. Washington Street, Suite 1220
Chicago, Illinois 60602
(312) 440-0020 telephone
(312) 440-4180 facsimile
www.attorneyzim.com

Counsel for the Complainants and Class

jeff@attorneyzim.com

ZIMMERMAN LAW OFFICES, P.C.

77 W. Washington Street, Suite 1220

Chicago, Illinois 60602

(312) 440-0020 telephone

(312) 440-4180 facsimile

www.attorneyzim.com

Counsel for the Complainants and Class