

STATE OF ILLINOIS
Pollution Control Board

BUSINESS ADDRESS:
Michael P. O'Shea, Jr.
216-10th St., P.O. Box 791
Cairo, Illinois 62914
Tel: (618) 734-1199
Fax: (618) 734-1245
ARDC No: 2122197

CERTIFICATE OF SERVICE

It is hereby certified that the original of the foregoing notice of filing was mailed, first class, for filing, on September 20, 2005, to the following address:

Dorothy M. Gunn, Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 W. Randolph St., Ste. 11-500
Chicago, Illinois 60601

and a copy of the foregoing motion was mailed, first class, on September 20, 2005, to the following person:

Thomas Davis
Office of the Attorney General
Environmental Bureau
500 South Second Street
Springfield, Illinois 62706



ILLINOIS POLLUTION CONTROL BOARD

RECEIVED
CLERK'S OFFICE

SEP 27 2005

STATE OF ILLINOIS
Pollution Control Board

PEOPLE OF THE STATE OF ILLINOIS,)	
)	
Complainant,)	
)	
vs.)	No. PCB 05-117
)	
CITY OF CAIRO,)	
)	
Respondent.)	

MOTION FOR EXTENSION OF TIME TO FILE
RESPONSIVE PLEADING

Now comes respondent, City of Cairo by its attorney, Michael P. O'Shea, Jr., and for their motion for extension of time to file responsive pleading, says as follows:

1. That on or about August 30, 2005, respondent was ordered to file an answer to the amended complaint filed by plaintiff, in the captioned cause.
2. That attorney for this respondent has been unable to discuss this pending litigation with the members of the council of the City of Cairo for the reason that, at the most recent regularly scheduled meeting of this council on September 13, 2005, the members of the council abruptly left the meeting before the meeting was adjourned and as a result of their departure, their attorney did not have an opportunity to present this matter to them.
3. That there is another regularly scheduled meeting on September 27, 2005, at which time, attorney for respondent intends to bring this matter to their attention; furthermore, that there is a special called meeting scheduled for September 22, 2005, but this matter is not on the agenda and therefore may not be discussed.

4. That this respondent hereby requests that it be given until October 11, 2005, to file its responsive pleading to the amended complaint filed herein.


WHEREFORE, respondent, City of Cairo, prays as follows

A. That this respondent be granted until October 11, 2005, to file its responsive pleading to the amended complaint filed herein by plaintiff;

B. For such other relief as may be just and equitable.

CITY OF CAIRO

BY:



Its Attorney

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ENTRY OF APPEARANCE

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Complainant,)	
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vs.)	No. PCB 05-117
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ENTRY OF APPEARANCE

The undersigned hereby enters his appearance as attorney for the above named respondent, City of Cairo.



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