

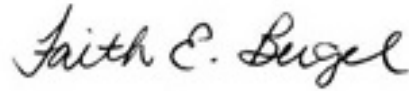
**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

|                              |   |                       |
|------------------------------|---|-----------------------|
| In the Matter of:            | ) |                       |
|                              | ) |                       |
| SIERRA CLUB, ENVIRONMENTAL   | ) |                       |
| LAW AND POLICY CENTER,       | ) |                       |
| PRAIRIE RIVERS NETWORK, and  | ) |                       |
| CITIZENS AGAINST RUINING THE | ) |                       |
| ENVIRONMENT                  | ) |                       |
|                              | ) | PCB No-2013-015       |
| Complainants,                | ) | (Enforcement – Water) |
|                              | ) |                       |
| v.                           | ) |                       |
|                              | ) |                       |
| MIDWEST GENERATION, LLC,     | ) |                       |
|                              | ) |                       |
| Respondents                  | ) |                       |

**NOTICE OF FILING**

PLEASE TAKE NOTICE that I have filed today with the Illinois Pollution Control Board the attached **COMPLAINANTS’ UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE A RESPONSE TO RESPONDENT’S MOTION TO STAY PROCEEDINGS**, copies of which are attached hereto and herewith served upon you.

Respectfully submitted,




---

Faith E. Bugel  
1004 Mohawk  
Wilmette, IL 60091  
(312) 282-9119  
FBugel@gmail.com

*Attorney for Sierra Club*

Dated: January 25, 2022

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

|                              |   |                       |
|------------------------------|---|-----------------------|
| In the Matter of:            | ) |                       |
|                              | ) |                       |
| SIERRA CLUB, ENVIRONMENTAL   | ) |                       |
| LAW AND POLICY CENTER,       | ) |                       |
| PRAIRIE RIVERS NETWORK, and  | ) |                       |
| CITIZENS AGAINST RUINING THE | ) |                       |
| ENVIRONMENT                  | ) |                       |
|                              | ) |                       |
| Complainants,                | ) |                       |
|                              | ) |                       |
| v.                           | ) | PCB No-2013-015       |
|                              | ) | (Enforcement – Water) |
| MIDWEST GENERATION, LLC,     | ) |                       |
|                              | ) |                       |
| Respondent.                  | ) |                       |

**COMPLAINANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE A RESPONSE TO RESPONDENT'S MOTION TO STAY PROCEEDINGS**

Complainants Sierra Club, Environmental Law & Policy Center (“ELPC”), Prairie Rivers Network, and Citizens Against Ruining the Environment (“CARE”), by their undersigned counsel, hereby request that the Hearing Officer enter an order granting Complainants’ motion to extend the time to file their response to Midwest Generation, LLC’s, Motion to Stay Proceedings.

In support of their Motion, Complainants state as follows:

1. On January 21, 2022, Respondent Midwest Generation filed a Motion to Stay Proceedings.
2. The two-week deadline to respond to a motion provided by Rule 101.500(d) coincides with the February 4, 2022 Motions in Limine deadline provided in the Hearing Officer’s Order of December 10, 2021.
3. Complainants are seeking a two-week extension to the deadline to respond to

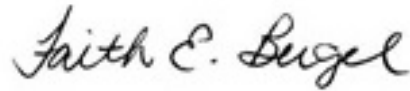
Respondent's Motion to Stay Proceedings. This extension would give Complainants until February 18, 2022 for their response.

4. Granting this extension for Complainants' response to the Motion to Stay Proceedings does not affect other dates in the schedule so it does not prejudice any party.
5. Counsel for Respondent communicated to counsel for Complainants that they do not oppose this extension.

WHEREFORE, Complainants respectfully request an extension of time to respond to Respondent's Motion to Stay Proceedings until February 18, 2022.

Dated: January 25, 2022

Respectfully submitted,



---

Faith E. Bugel  
1004 Mohawk  
Wilmette, IL 60091  
(312) 282-9119  
FBugel@gmail.com

Gregory E. Wannier  
2101 Webster St., Ste. 1300  
Oakland, CA 94612  
(415) 977-5646  
Greg.Wannier@sierraclub.org

*Attorneys for Sierra Club*

Abel Russ  
Environmental Integrity Project  
1000 Vermont Avenue NW  
Washington, DC 20005  
802-662-7800 (phone)  
ARuss@environmentalintegrity.org

*Attorney for Prairie Rivers Network*

Kiana Courtney  
Cantrell Jones  
Environmental Law & Policy Center  
35 East Wacker Drive, Suite 1600  
Chicago, IL 60601  
kcourtney@elpc.org  
cjones@elpc.org

*Attorney for ELPC, Sierra Club and  
Prairie Rivers Network*

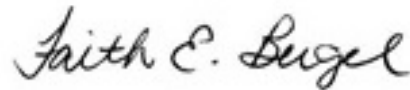
Keith Harley  
Chicago Legal Clinic, Inc.  
211 W. Wacker, Suite 750  
Chicago, IL 60606  
312-726-2938  
KHarley@kentlaw.iit.edu

*Attorney for CARE*

**CERTIFICATE OF SERVICE**

The undersigned, Faith E. Bugel, an attorney, certifies that I have served electronically upon the Clerk and by email upon the individuals named on the attached Service List a true and correct copy of **COMPLAINANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE A RESPONSE TO RESPONDENT'S MOTION TO STAY PROCEEDINGS** before 5 p.m. Central Time on January 25, 2022 to the email addresses of the parties on the attached Service List. The entire filing package is 5 pages.

Respectfully submitted



---

Faith E. Bugel  
1004 Mohawk  
Wilmette, IL 60091

**PCB 2013-015 SERVICE LIST:**

Jennifer T. Nijman  
Kristen L. Gale  
NIJMAN FRANZETTI LLP  
10 South LaSalle Street, Suite 3600  
Chicago, IL 60603

Kiana Courtney  
Cantrell Jones  
Environmental Law & Policy Center  
35 E. Wacker Dr., Suite 1600  
Chicago, IL 60601

Bradley P. Halloran,  
Hearing Officer  
Illinois Pollution Control Board  
100 West Randolph St., Suite 11-500  
Chicago, IL 60601

Abel Russ  
Environmental Integrity Project  
1000 Vermont Avenue NW  
Washington, DC 20005

Gregory E. Wannier  
Sierra Club  
2101 Webster St., Ste. 1300  
Oakland, CA 94612  
(415) 977-5646  
Greg.Wannier@sierraclub.org

Keith Harley  
Chicago Legal Clinic, Inc.  
211 W. Wacker, Suite 750  
Chicago, IL 60606