Electronic Filing: Received, Clerk's Office 03/13/2023

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PAUL CHRISTIAN PRATAPAS,) Complainant,) v.) STEEPLE RUN ELEMENRTARY SCHOOL) And OZYNGA CONCRETE YARD #281,) Respondents.)

NOTICE OF ELECTRONIC FILING

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Pollution Control Board the **Respondent's Motion for Extension of Time to Answer or Otherwise Plead**, copies of which are herewith served upon you.

Respectfully Submitted,

Naperville CUSD No. 203,

By: /s/ Kenneth M. Florey

One of Its Attorneys

Kenneth M. Florey (<u>kflorey@robbins-schwartz.com</u>) ROBBINS, SCHWARTZ, NICHOLAS, LIFTON & TAYLOR, LTD. 55 W Monroe, Suite 800 Chicago, Illinois 60603 312-332-7760 (ph) 312-332-7768 (fax) DuPage County No. 71875

CERTIFICATE OF SERVICE

I, **Kenneth M. Florey**, an attorney, certify that I caused a copy of this Notice of Filing and the documents referenced therein to be served upon the below named individuals by electronic mail, this 13th day of March, 2023.

By: _____/s/ Kenneth M. Florey

Service List

Mr. Paul Christian Pratapas 1330 E. Chicago Avenue, Unit 110 Naperville, IL 60540 paulpratapas@gmail.com

JR Wydra Ozynga Concrete Associate General Counsel jrwydra@ozinga.com (708) 326-4225 Illinois Pollution Control Board Attn: Don Brown – Clerk of the Board 100 W. Randolph Street, Suite 11-500 Chicago, IL 60601 <u>don.brown@illinois.gov</u>

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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PAUL CHRISTIAN PRATAPAS,)	
Complainant,))	
v.)	PCB 2023-083
STEEPLE RUN ELEMENRTARY SCHOOL And OZYNGA CONCRETE YARD #281,)))	
Respondents.)	

<u>RESPONDENT NAPERVILLE CUSD NO. 203'S MOTION FOR EXTENSION</u> OF TIME TO ANSWER OR OTHERWISE PLEAD

RESPONDENT Naperville CUSD No. 203 ("District"), by their attorneys, Robbins Schwartz Nicholas Lifton Taylor, Ltd., and for its Motion for Extension of Time to Answer or Otherwise Plead, states as follows:

1. On January 20, 2023, the District filed its appearance in this matter.

2. The parties are in the process of exploring the possibility of settlement of this matter.

3. As such, the District now requests additional time to prepare and file its answer or otherwise plead to the Complaint to determine if the parties are able to resolve this matter.

4. Granting of this motion will not unduly delay resolution of this matter or prejudice any party.

5. Counsel for the District respectfully requests an additional 28 days to answer or otherwise plead, up to and including April 10, 2023.

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WHEREFORE, the District respectfully requests that this Court grant its Motion for an Extension of Time to Answer or Otherwise Plead until April 10, 2023, and for any other relief this Court deems necessary and just.

Respectfully submitted,

Naperville CUSD No. 203,

/s/ Kenneth M. Florey One of Its Attorneys

Kenneth M. Florey (<u>kflorey@robbins-schwartz.com</u>) ROBBINS, SCHWARTZ, NICHOLAS, LIFTON & TAYLOR, LTD. 55 W Monroe, Suite 800 Chicago, Illinois 60603 312-332-7760 (ph) 312-332-7768 (fax) DuPage County No. 71875

CERTIFICATE OF SERVICE

Under penalties as provided by law pursuant to 735 ILCS 5/1-109 of the Code of Civil Procedure, the undersigned, an attorney, certifies that on March 13, 2023, he served the foregoing **Respondent's Motion for Extension of Time to Answer or Otherwise Plead**, upon the parties listed below via electronic mail.

By: /s/ Kenneth M. Florey One of Respondent's Attorneys

Mr. Paul Christian Pratapas 1330 E. Chicago Avenue, Unit 110 Naperville, IL 60540 paulpratapas@gmail.com

JR Wydra Ozynga Concrete Associate General Counsel jrwydra@ozinga.com Illinois Pollution Control Board Attn: Don Brown – Clerk of the Board 100 W. Randolph Street, Suite 11-500 Chicago, IL 60601 don.brown@illinois.gov