

07/02/2023
IPCB 2023-074

Paul Christian Pratapas
Complainant

v

Pulte Home Company, LLC
Respondent

COMPLAINANTS MOTION FOR EXTENSION TO FILE POS FOR PULTE HOME COMPANY, LLC

WHEREAS The Board set a July 3, 2023 deadline to refile the POS for the formal complaint IPCB 2023-062

WHEREAS Pulte Home Company, LLC has been named in several formal complaints with The Board

WHEREAS the project site for this complaint 2023-074 did not have required signage posted for permit compliance and determining contact information

WHEREAS Respondent has refused access to the SWPPP Book across their sites which is required to contain registered agent information

WHEREAS Complainant has expended significant time and money addressing violations by Pulte Home Company and their industry partners amid widespread disregard for regulations

WHEREAS Complainant currently cannot afford to re-serve Respondent via certified mail

WHEREAS Complainant still has not been able to identify a registered agent, officer, or other agent to receive service

COMPLAINANT RESPECTFULLY REQUESTS:

- 1. PROOF OF SERVICE BE ACCEPTED AS SERVED GIVEN THE DUE DILIGENCE ALREADY PUT FORTH ; OR**
- 2. GRANT AN EXTENSION TO REFILE THE POS FOR RESPONDENT AND TO PROVIDE A NAME AND ADDRESS OF A REGISTERED AGENT, OFFICER, OR OTHER AGENT TO RECEIVE SERVICE**

Paul Christian Pratapas July 2, 2023

Paul Christian Pratapas
1779 Kirby Parkway, Ste 1, #92
Memphis, TN 38138
630.210.1637

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PAUL CHRISTIAN PRATAPAS,)

Complainant,)

) PCB No: 23-74

v.) (Citizens Enforcement – Water))

,)

Respondent,)

PULTE HOME COMPANY, LLC)

NOTICE OF FILING

TO: See Attached Service List

PLEASE TAKE NOTICE that on July 2nd 2023, PAUL CHRISTIAN PRATAPAS electronically filed with the Office of the Clerk of the Illinois Pollution Control Board

MOTION TO ACCEPT PROOF OF SERVICE OR PROVIDE EXTENSION, a copy of which is hereby served upon you.

Paul Christian Pratapas
Complainant

Paul Christian Pratapas July 2, 2023

Paul Christian Pratapas
paul.pratapas@gmail.com
1779 Kirby Parkway, STE 1-92
Memphis, TN 38138
630.210.1637

CERTIFICATE OF SERVICE

I, Paul Christian Pratapas, certify that I caused the foregoing MOTION TO ACCEPT PROOF OF SERVICE OR PROVIDE EXTENSION to be served all parties of record, as shown below:

Paul Christian Pratapas
paulpratapas@gmail.com
1779 Kirby Parkway, Ste 1, #92
Memphis, Tennessee 38138

Illinois Pollution Control Board
Don Brown - Clerk of the Board
don.brown@illinois.gov
100 W. Randolph St. Suite 11-500
Chicago, Illinois 60601
(312)-814-3620

Swanson, Martin & Bell
Michael J. Maher
mmaher@smbtrials.com
One IBM Plaza, 330 North Wabash Suite 3300
Chicago, IL 60611
(312)-321-9100

by causing a copy of same to be sent via email transmission to the email addresses reflected above, on the 2nd day of July, 2023.

Paul Christian Pratapas

Complainant

Paul Christian Pratapas July 2, 2023