

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

RECEIVED
CLERK'S OFFICE

JUL 8 2003

STATE OF ILLINOIS
Pollution Control Board

PEOPLE OF THE STATE OF)
ILLINOIS,)
)
Complainant,)
)
v.)
)
SAINT-GOBAIN CONTAINERS,)
INC., a Delaware corporation,)
)
Respondent.)

PCB NO. 03-22
(Enforcement)

NOTICE OF FILING

To: N. LaDonna Driver
Hodge Dwyer Zeman
3150 Roland Avenue
P.O. Box 5776
Springfield, IL 62705-5776

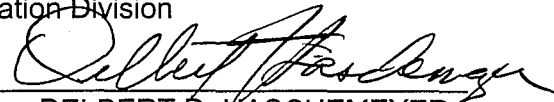
PLEASE TAKE NOTICE that on this date I mailed for filing with the Clerk of the Pollution Control Board of the State of Illinois, a MOTION FOR EXTENSION OF TIME TO RESPOND TO RESPONDENT'S DISCOVERY REQUESTS, a copy of which is attached hereto and herewith served upon you.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS

LISA MADIGAN
Attorney General of the
State of Illinois

MATTHEW J. DUNN, Chief
Environmental Enforcement/Asbestos
Litigation Division

BY: 
DELBERT D. HASCHEMEYER
Assistant Attorney General
Environmental Bureau

500 South Second Street
Springfield, Illinois 62706
217/782-9031
Dated: July 2, 2003

CERTIFICATE OF SERVICE

I hereby certify that I did on July 2, 2003, send by First Class Mail, with postage thereon fully prepaid, by depositing in a United States Post Office Box a true and correct copy of the following instruments entitled NOTICE OF FILING and MOTION FOR EXTENSION OF TIME TO RESPOND TO RESPONDENT'S DISCOVERY REQUESTS


To: N. LaDonna Driver
Hodge Dwyer Zeman
3150 Roland Avenue
P.O. Box 5776
Springfield, IL 62705-5776

and the original and ten copies by First Class Mail with postage thereon fully prepaid of the same foregoing instrument(s):

To: Dorothy Gunn, Clerk
Illinois Pollution Control Board
State of Illinois Center
Suite 11-500
100 West Randolph
Chicago, IL 60601

A copy was also sent by First Class Mail with postage thereon fully prepaid

To: Carol Sudman
Hearing Officer
Illinois Pollution Control Board
600 South Second Street
Springfield, IL 62704


Delbert D. Haschemeyer
Assistant Attorney General

This filing is submitted on recycled paper.

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MOTION FOR EXTENSION OF TIME TO RESPOND
TO RESPONDENT'S DISCOVERY REQUESTS

NOW COMES the Complainant, PEOPLE OF THE STATE OF ILLINOIS, by LISA MADIGAN, Attorney General of the State of Illinois, and pursuant to 35 Ill. Adm. Code Sections 101.502, 101.422 and 101.610(n), requests that the Hearing Officer grant Complainant's Motion for Extension of Time to Respond to Respondent's Discovery Requests. In support of this Motion, Complainant states as follows:

1. On or about May 27, 2003, Respondent served its Requests for Production and First Set of Interrogatories Directed to the Complainant on Complainant.
2. Pursuant to the Illinois Pollution Control Board's procedural rules at 35 Ill. Adm. Code Part 101, responses to Respondent's discovery are currently due within 28 days of service, *i.e.*, June 24, 2003.
3. On June 16, 2003, Complainant submitted a Motion for Extension of Time to Respond to Respondent's Discovery Requests requesting an extension to July 24, 2003, in which to file its Response to Respondent's Discovery Request.
4. Complainant is attempting to respond to the Respondent's discovery requests. Nevertheless, Complainant will be unable to complete its responses by July 24, 2003.

Therefore, Respondent requests an extension of time for 15 days, to and including August 8, 2003, in which to file its responses to Respondent's discovery requests.

4. This Motion is made in good faith and not for purposes of delay.

5. Counsel for the Complainant has contacted counsel for the Respondent, and he has indicated that he has no objection to this request being granted.

WHEREFORE, for the above and foregoing reasons, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Hearing Officer grant this Motion for Extension of Time, and allow the Complainant an extension of time for 15 days, or until August 8, 2003, in which to file its responses to Respondent's Requests for Production and First Set of Interrogatories Directed to the Complainant.


Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS,

LISA MADIGAN,
Attorney General
of the State of Illinois,

MATTHEW J. DUNN, Chief
Environmental Enforcement/Asbestos
Litigation Division

BY:


DELBERT D. HASCHEMEYER
Assistant Attorney General
Environmental Bureau

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Dated: July 2, 2003