

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD **JUL 21 2003**

PEOPLE OF THE STATE OF ILLINOIS,)
)
Complainant,)
)
vs.)
)
COMMUNITY LANDFILL COMPANY,)
INC., an Illinois corporation,)
)
Respondent.)

STATE OF ILLINOIS
Pollution Control Board

PCB No. 97-193
(Enforcement)

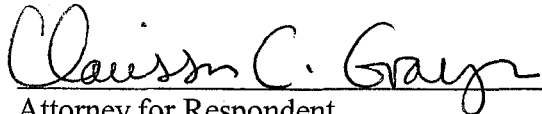
NOTICE OF FILING

TO: Ms. Dorothy Gunn, Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 W. Randolph Street, 11-500
Chicago, IL 60601

Mr. Christopher Grant
Assistant Attorney General
Environmental Bureau
188 W. Randolph, 20th Floor
Chicago, IL 60601

Mr. Brad Halloran
Hearing Officer
Illinois Pollution Control Board
100 W. Randolph Street, Suite 11-500
Chicago, IL 60601

PLEASE TAKE NOTICE that on July 21, 2003, we filed with the Clerk of the Illinois Pollution Control Board an original and four copies of AGREED MOTION TO EXTEND DISCOVERY SCHEDULE, a copy of which is attached and herewith served upon you.



Attorney for Respondent

Mark A. LaRose
Clarissa C. Grayson
Attorney No. 37346
LaRose & Bosco, Ltd.
734 N. Wells Street
Chicago, IL 60610
(312) 642-4414
Fax (312) 642-0434

THIS FILING IS SUBMITTED ON RECYCLED PAPER

RECEIVED

CLERK'S OFFICE

JUL 21 2003

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

STATE OF ILLINOIS
Pollution Control Board

PEOPLE OF THE STATE OF ILLINOIS,)

Complainant,)

vs.)

PCB No. 97-193

(Enforcement)

COMMUNITY LANDFILL COMPANY,)

INC., an Illinois corporation,)

Respondent.)

AGREED MOTION TO EXTEND DISCOVERY SCHEDULE

This matter coming before the Illinois Pollution Control Board on the parties Agreed Motion to Extend Discovery Schedule, Christopher Grant, Assistant Attorney General, on behalf of the People of the State of Illinois, Complainant, and Mark A. LaRose and Clarissa Grayson, LaRose & Bosco, Ltd., on behalf of Community Landfill Company, Respondent, and in support thereof, state as follows:

1. The parties seek an extension from the Board of the discovery cut-off date to September 15, 2003.
2. The parties currently are under a discovery cut-off date of August 1, 2003. This date had been extended previously from June 17, 2003.
3. A series of unfortunate events contributed to the necessity of the parties requesting this additional extension, summarized briefly as follows:
 - a. LaRose and Bosco, Ltd. associate attorney Michael J. Vint died suddenly on May 19, 2003. His untimely death was both a personal tragedy for the entire firm and a cause of numerous disruptions to the remaining four attorneys in the firm as his caseload was reassigned. A large portion of his cases were distributed to respondent's attorneys Mark A.

LaRose and Clarissa Grayson.

b. Mr. Vint had been assisting Mark LaRose with the preparation for trial in a case in the Western District of Michigan which is scheduled to take place during the Court's August trial term, August 4-29, 2003. Mr. Vint's death has left Mr. LaRose with the sole responsibility of preparing for the trial.

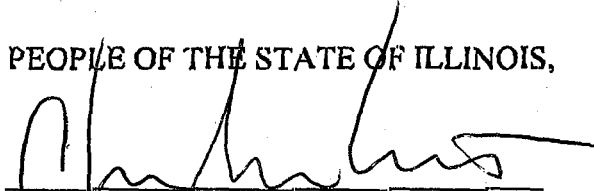
c. In late May, 2003, Ms. Grayson's brother became seriously ill in Atlanta, Georgia which required her presence. His illness and subsequent death in mid-June resulted in her taking numerous unplanned personal days which placed an additional burden on LaRose & Bosco, Ltd.

4. The parties do not anticipate requesting any further extensions of the discovery cut-off date in the above referenced matter. The parties have currently set dates for the exchange of documents and are in the process of re-setting a limited number of depositions tentatively scheduled to take place starting August 13, 2003 through the end of August, 2003.

WHEREFORE, based on the foregoing, the parties respectfully request that the Board grant the parties' Agreed Motion to Extend the Discovery Schedule, and extend the discovery cut-off date to September 15, 2003 in the above referenced matter.

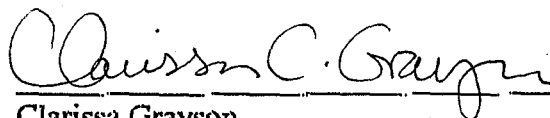
Respectfully Submitted,

PEOPLE OF THE STATE OF ILLINOIS,



Christopher Grant
Assistant Attorney General

COMMUNITY LANDFILL COMPANY,



Clarissa Grayson

Christopher Grant
Assistant Attorney General
Environmental Bureau
188 W. Randolph, 20th Floor
Chicago, Illinois 60601
(312) 814-2381

Mark A. LaRose
Clarissa C. Grayson
LaRose & Bosco, Ltd.
734 N. Wells Street
Chicago IL 60610
(312) 642-4414

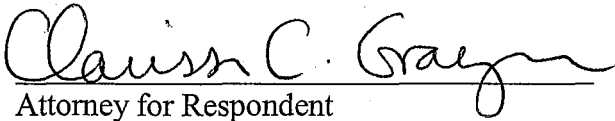
CERTIFICATE OF SERVICE

The undersigned, an attorney, on oath states that she caused to be served a copy of the foregoing AGREED MOTION TO EXTEND DISCOVERY SCHEDULE to the following parties of record, by placing same in U.S. Mail, postage prepaid, this 21st day of July, 2003:

Ms. Dorothy Gunn, Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 W. Randolph Street
Chicago, IL 60601

Mr. Christopher Grant
Environmental Bureau
Assistant Attorney General
188 West Randolph Street, 20th Floor
Chicago, IL 60601

Mr. Brad Halloran
Hearing Officer
Illinois Pollution Control Board
James R. Thompson Center
100 W. Randolph Street
Chicago, IL 60601


Attorney for Respondent

Mark A. LaRose
Clarissa C. Grayson
Attorney No. 37346
LaRose & Bosco, Ltd.
734 N. Wells Street
Chicago, IL 60610
(312) 642-4414
Fax (312) 642-0434