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JUN 14 2004

STATE OF ILLINOIS
Pollution Control Board

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS)
LISA MADIGAN, Attorney General)
State of Illinois,)

Complainant,)

vs.)

SMITHFIELD PROPERTIES, L.L.C.)
An Illinois limited liability Company,)
WOOTON CONSTRUCTION LTD., an)
Illinois corporation, and CHICAGO SUN-TIMES,)
INC., a Delaware Corporation,)

Respondents.)

PCB 04-192


(Enforcement-Land, Water)

NOTICE OF FILING

TO: Zemheret Bereket-Ab, Esq.
Assistant Attorney General
Environmental Bureau
188 W. Randolph Street, 20th Floor
Chicago, Illinois 60601

Kevin B. Hynes
O'Keefe, Lyons & Hynes, LLC
30 North LaSalle Street
Suite 4100
Chicago, Illinois 60602

PLEASE TAKE NOTICE that I have today filed with the Clerk of the Pollution Control Board the **Agreed Motion to Hearing Officer for Extension of Time** of Chicago Sun-Times, Inc., a copy of which is herewith served upon you.


Michael S. Mostow

Janine M. Landow-Esser
Michael S. Mostow
QUARLES & BRADY LLC
500 W. Madison Street, Suite 3700
Chicago, Illinois 60661
312.715.5000

ATTORNEYS FOR RESPONDENT
CHICAGO SUN-TIMES, INC.

THIS DOCUMENT IS SUBMITTED ON RECYCLED PAPER

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD **JUN 14 2004**

PEOPLE OF THE STATE OF ILLINOIS
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Company, WOOTON CONSTRUCTION
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Respondents.

No. PCB No. 04-192
(Enforcement-Land &
Water)

STATE OF ILLINOIS
Pollution Control Board

AGREED MOTION TO HEARING OFFICER FOR EXTENSION OF TIME


Respondent, Chicago Sun-Times, Inc. ("Sun-Times"), by its attorneys, Quarles & Brady LLP, requests that the Hearing Officer grant Sun-Times until July 23, 2004 to answer The State of Illinois' complaint, and in support thereof states as follows:

1. Sun-Times' answer to the complaint in this action was due on or before July 7, 2004.
2. Shortly before July 7, 2004, in-house counsel for Sun-Times originally responsible for this action was replaced. The in-house counsel for Sun-Times currently responsible for this action requires additional time to learn about this action before Sun-Times will be able to answer the complaint.
3. Upon learning of this situation on July 7, 2004, counsel for Sun-times contacted counsel for the State of Illinois and requested and received the State's agreement to a motion to extend the time for Sun-Times to answer the complaint. Counsel for the Sun-Times and the

State of Illinois agreed during a conference call on July 13, 2004 that said motion should request that Sun-Times have until July 23, 2004 to answer the complaint.

WHEREFORE, Sun-Times respectfully request that it be granted until July 23, 2004 to answer the complaint in this action.

Respectfully submitted,


Michael S. Mostow

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ATTORNEYS FOR THE CHICAGO SUN-TIMES, INC.

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