

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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

-vs- )

EDWARD PRUIM, an individual, and )  
ROBERT PRUIM, an individual, )  
Respondents. )

PCB No. 04-207  
PCB No. 97-193  
(Consolidated)  
(Enforcement)

People of the State of Illinois, )  
by LISA MADIGAN, Attorney )  
General of the State of Illinois, )  
Complainant, )

-vs- )

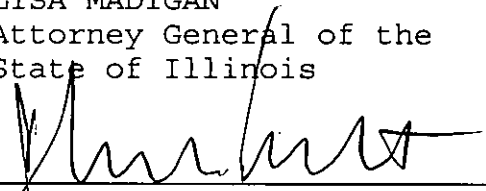
Community Landfill Company, Inc. )  
Respondent. )

**NOTICE OF FILING**

PLEASE TAKE NOTICE that we have today, January 30, 2006, filed with the Office of the Clerk of the Illinois Pollution Control Board, by electronic filing, Complainant's Motion to Extend Time, a copy of which is attached herewith and served upon you.

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

BY:



CHRISTOPHER GRANT  
Assistant Attorney General  
Environmental Bureau  
188 W. Randolph St., 20<sup>th</sup> Flr.  
Chicago, IL 60601  
(312) 814-5388

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Community Landfill Company, Inc. )  
Respondent. )

MOTION FOR EXTENSION OF TIME TO RESPOND

Now comes Complainant, PEOPLE OF THE STATE OF ILLINOIS , by LISA MADIGAN, Attorney General of the State of Illinois, and requests additional time to file its Response to Respondents', Edward Pruim and Robert Pruim's, Motions for Summary Judgment. In support thereof, Complainant states, as follows:

1. On Friday, January 13, 2006, Respondents Edward Pruim and Robert Pruim served Complainant with the two Motions for Summary Judgment.

2. On that same date, the undersigned was assigned to an emergency referral from Illinois EPA, addressing serious landfill gas odor problems at the Congress Landfill, Hillside, Cook County, Illinois. Landfill gas emissions were affecting the health and welfare of persons in the vicinity, including two hotels and a nursing home.

3. Abating the imminent danger from the landfill gas emissions required immediate and complete dedication to the new matter. During the following 14 days, the undersigned appeared on behalf of the State of Illinois in several different courts, including the United States Bankruptcy Court for the Northern District of Illinois. On January 20, 2006, the undersigned filed its Complaint on behalf of the State in *People v. Congress Development Company et al.*, 06 CH 1438 (Cook County). On the afternoon of January 26, 2006, following a vigorously contested hearing, the Court entered a preliminary injunction requiring the *Congress* Defendants to take immediate and effective action to address the odor problems.

4. Due to the unexpected emergency matter, and despite Complainant's best efforts, it is unable to properly respond to Respondents' Motions within the 14 days allowed by the Board procedural rules. However, Complainant will be able to file its response no later than Friday, February 3, 2006.

WHEREFORE, Complainant requests that the Board grant an extension, and leave to file its Response to Respondent Edward Pruum's and Robert Pruum's Motions for Summary Judgment by February 3, 2006.

RESPECTFULLY SUBMITTED,

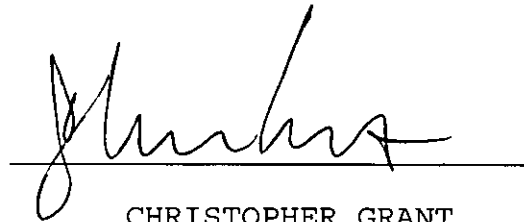
BY:



CHRISTOPHER GRANT  
Environmental Bureau  
Assistant Attorney General  
188 West Randolph Street,  
20<sup>th</sup> Floor  
Chicago, IL 60601  
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CERTIFICATE OF SERVICE

I, CHRISTOPHER GRANT, an attorney, do certify that I caused to be served this 30<sup>th</sup> day of January, 2006, Complainant's Motion to Extend Time, and Notice of Filing, upon the persons listed below by placing same in an envelope bearing sufficient postage with the United States Postal Service located at 100 W. Randolph, Chicago.

A handwritten signature in black ink, appearing to read "Christopher Grant", is written over a horizontal line.

CHRISTOPHER GRANT

SERVICE LIST:

Mr. Mark Larose  
Ms. Clarissa Grayson  
Larose & Bosco, Ltd.  
200 N. La Salle Street, #2810  
Chicago, IL 60601

Mr. Bradley P. Halloran  
Hearing Officer  
Illinois Pollution Control Board  
100 W. Randolph  
Chicago, Illinois 60601 [via hand delivery]