#### BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,	)	
by LISA MADIGAN, Attorney General	)	
of the State of Illinois	)	
	)	
Complainant,	)	
	)	PCB No. 11-79
v.	)	
	)	
INVERSE INVESTMENTS, L.L.C.,	)	
an Illinois Limited Liability Company,	)	
	)	
Respondent.	)	

#### **NOTICE OF FILING**

TO: Attached Service List

PLEASE TAKE NOTICE that I have electronically filed today with the Office of the Clerk of the Pollution Control Board Agreed Motion for Extension of Time, a copy of which is attached hereto and herewith served upon you.

INVERSE INVESTMENTS, L.L.C.

By: Jennifer T. Nijman

Date: June 1, 2011

Jennifer T. Nijman Nijman Franzetti LLP 10 S. LaSalle St., Suite 3600 Chicago, IL 60603 (312) 251-5255

## SERVICE LIST

John Therriault, Assistant Clerk Illinois Pollution Control Board James R. Thompson Center 100 W. Randolph St., Suite 11-500 Chicago, IL 60601 Krystyna Bednarczyk Assistant Attorney General Environmental Bureau 69 West Washington Street, 18<sup>th</sup> Floor Chicago, IL 60602

#### BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,	)	
by LISA MADIGAN, Attorney General	)	•
of the State of Illinois	j j	
Commissioner	)	
Complainant,	)	PCB No. 11-79
v.	)	1001(0.117)
INVERSE INVESTMENTS, L.L.C.,	)	
an Illinois Limited Liability Company,	)	
	)	
Respondent.	)	

#### AGREED MOTION FOR EXTENSION OF TIME

Pursuant to 35 Ill. Adm. Code 101.522, Inverse Investments, L.L.C. ("Inverse") submits this Agreed Motion for Extension of Time to file responsive motions. In support of its Motion, Inverse states as follows:

- 1. The Attorney General, on behalf of the People of the State of Illinois, filed a Complaint with the Illinois Pollution Control Board on May 4, 2011 and served the Complaint on Inverse's representative on or about May 5, 2011.
- 2. Pursuant to 35 Ill. Adm. Code 101.506, all motions to dismiss any pleading are to be filed within 30 days after service. Therefore, a responsive motion would be due on or about June 6, 2011.
- 3. Counsel for Inverse contacted the Attorney General's Office and requested an extension of time to file responsive motions under 35 Ill. Adm. Code 101.506. The Attorney General's Office agreed to an extension until the date an answer is due, July 5, 2011.

WHEREFORE, Inverse respectfully requests that the Hearing Officer grant its Agreed

Motion for Extension of Time to file responsive motions until July 5, 2011

INVERSE INVESTMENTS, L.L.C.

By:

Jennifer T. Niim

Dated: June 1, 2011

Jennifer T. Nijman Nijman Franzetti LLP 10 S. LaSalle St., Suite 3600 Chicago, IL 60603 (312) 251-5255

### **CERTIFICATE OF SERVICE**

The undersigned certifies that on this 1<sup>st</sup> day of June, 2011, she served electronically the attached NOTICE OF FILING and AGREED MOTION FOR EXTENSION OF TIME upon the following person:

John Therriault, Assistant Clerk Illinois Pollution Control Board James R. Thompson Center 100 West Randolph Street, Suite 11-500 Chicago, IL 60601

and by U.S. Mail, first class postage prepaid, to the following person:

Krystyna Bednarczyk Assistant Attorney General Illinois Attorney General's Office Environmental Bureau 69 W. Washington Street, Suite 1800 Chicago, IL 60602

Jennifér \T. Nijmar