

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

RECEIVED  
CLERK'S OFFICE

SEP 06 2012

STATE OF ILLINOIS  
Pollution Control Board

PEOPLE OF THE STATE OF ILLINOIS )  
)  
Complainant, )  
)  
v. )  
)  
KEHRER BROTHERS CONSTRUCTION )  
INC., an Illinois corporation )  
)  
Respondent. )

PCB NO. 2012-132  
(Enforcement - Land)

ORIGINAL  
RETURN TO CLERK'S OFFICE

**CONSENT MOTION FOR EXTENSION  
OF TIME TO FILE RESPONSIVE PLEADING**

Respondent Kehrer Brothers Construction, Inc. ("Kehrer Brothers"), by and through their undersigned counsel, pursuant to 35 ILL. ADMIN. CODE §101.522, moves the Hearing Officer and Board with consent of Plaintiff State of Illinois for an additional thirty (30) day extension of time, up to and including, October 8th, 2012, to file its responsive pleading to the State of Illinois' Complaint. Respondent Kehrer Brothers does not bring this Motion for purposes of delay, but seeks additional time to continue discussions with the State of Illinois.

GREENSFELDER, HEMKER & GALE, P.C.

By: Shannon Haney  
Richard E. Greenberg, pro hac vice  
[reg@greensfelder.com](mailto:reg@greensfelder.com)  
Shannon L. Haney, No. 06284858  
[slh@greensfelder.com](mailto:slh@greensfelder.com)  
10 South Broadway, Suite 2000  
St. Louis, MO 63102  
(314) 241-9090  
(314) 345-4792 FAX

RECEIVED  
CLERK'S OFFICE

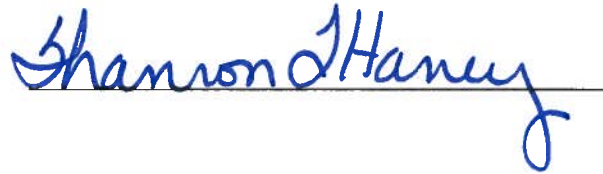
SEP 06 2012

STATE OF ILLINOIS  
Pollution Control Board

**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing document was served upon the attorney set forth below, by electronic mail and by enclosing same in an envelope addressed to said attorney, with first-class postage thereon fully prepaid and by depositing said envelope in a U.S. Post Office mailbox in St. Louis, Missouri, on the 5<sup>th</sup> day of September, 2012.

Raymond J. Callery  
Assistant Attorney General  
500 South Second Street  
Springfield, Illinois 62706

A handwritten signature in blue ink, reading "Shannon Haney", written over a horizontal line.

**Shannon L. Haney**  
**Direct Dial 314/345-4779**  
**Direct Fax 314/345-4792**

September 5, 2012

**RECEIVED**  
**CLERK'S OFFICE**

**SEP 06 2012**

**STATE OF ILLINOIS**  
**Pollution Control Board**

**VIA OVERNIGHT MAIL**

Pollution Control Board, Attn: Clerk  
100 West Randolph Street  
James R. Thompson Center, Suite 11-500  
Chicago, Illinois 60601-3218

**Re: State of Illinois v. Kehrer Brothers Construction, Inc.**  
**PCB No. 2012-132**  
**(Enforcement – Land)**

Dear Clerk:

Enclosed for filing please find an original and nine (9) copies of our Consent Motion for Extension of Time to File Responsive Pleading in the above-captioned matter. Please return a file-stamped copy to the undersigned in the enclosed self-addressed stamped envelope.

Thank you for your assistance in this matter.

Sincerely,

GREENSFELDER, HEMKER & GALE, P.C.

By   
Shannon L. Haney

SLH/seh  
Enclosures  
1367720