

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)
)
Complainant,)
)
v.)
)
MIDWEST ENVIRONMENTAL)
CONSULTING SERVICES, INC., an)
Illinois corporation, and)
UNIVERSAL ASBESTOS REMOVAL,)
INC., an Illinois corporation,)
)
Respondents.)

PCB NO. 13-51
(Enforcement - Air)

NOTICE OF MOTION

TO: **Via Regular Mail**
Scott E. Nemanich, Esq.
Hinshaw & Culbertson LLP
4343 Commerce Court, Suite 415
Lisle, IL 60532


Via Regular Mail
Timothy J. Rathbun, Esq.
Rathbun, Cservenyak & Kozol, LLC
3260 Executive Drive
Joliet, Illinois 60431

Via E-Mail
Bradley P. Halloran, Esq.
Hearing Officer
Illinois Pollution Control Board
James R. Thompson Center, Suite 11-500
100 W. Randolph Street
Chicago, Illinois 60601
Brad.Halloran@illinois.gov

PLEASE TAKE NOTICE that on the 24th day of May, 2013, the Plaintiff, PEOPLE OF THE STATE OF ILLINOIS, filed the attached Motion for Extension of Time for Midwest Environmental Consulting Services, Inc. to Answer or Otherwise Respond to the Complaint, a true and correct copy of which is attached hereto and is hereby served upon you.

RESPECTUFLLY SUBMITTED,

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

BY: 
Kathryn A. Pament
Environmental Bureau
Assistant Attorney General
69 W. Washington Street, #1800
Chicago, Illinois 60602
(312) 814-0608

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PEOPLE OF THE STATE OF ILLINOIS,)

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PCB NO. 13-51
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MIDWEST ENVIRONMENTAL)
CONSULTING SERVICES, INC., an)
Illinois corporation, and)
UNIVERSAL ASBESTOS REMOVAL,)
INC., an Illinois corporation,)

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**MOTION FOR EXTENSION OF TIME
FOR MIDWEST ENVIRONMENTAL CONSULTING SERVICES, INC.
TO ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT**

People of the State of Illinois ("Complainant") and Midwest Environmental Consulting Services, Inc. ("Midwest Environmental"), for their Motion for Extension of Time for Midwest Environmental Consulting Services, Inc. to Answer or Otherwise Respond to the Complaint, hereby state as follows:

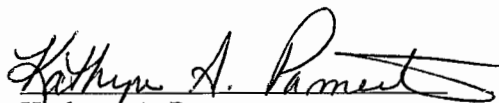
1. On March 29, 2013, Complainant filed a Complaint against Midwest Environmental, alleging violations of the Illinois Environmental Protection Act and the Illinois Pollution Control Board's regulations regarding air pollution. Midwest Environmental's answer or other responsive pleading to the Complaint is due on or before May 28, 2013.

2. Complainant and Midwest Environmental are engaged in substantive negotiations of the terms of a Stipulation and Proposal for Settlement to resolve the case as against Midwest Environmental.

3. Accordingly, Complainant and Midwest Environmental seek an extension of Midwest Environmental's time to answer or otherwise respond to the Complaint.¹

WHEREFORE, Complainant and Midwest Environmental respectfully request that the Board grant (1) Midwest Environmental an extension of time to answer or otherwise respond to the Complaint on or before June 12, 2013, and (2) such other relief as the Board deems proper.

Respectfully submitted,



Kathryn A. Pamerter
Assistant Attorney General, Environmental Bureau
69 W. Washington St., 18th Floor
Chicago, IL 60602
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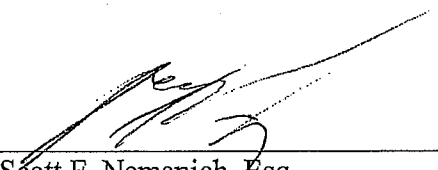
¹This request for an extension does not apply to Universal Asbestos Removal, Inc.

3. Accordingly, Complainant and Midwest Environmental seek an extension of Midwest Environmental's time to answer or otherwise respond to the Complaint.¹

WHEREFORE, Complainant and Midwest Environmental respectfully request that the Board grant (1) Midwest Environmental an extension of time to answer or otherwise respond to the Complaint on or before June 12, 2013, and (2) such other relief as the Board deems proper.

Respectfully submitted,

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¹This request for an extension does not apply to Universal Asbestos Removal, Inc.

CERTIFICATE OF SERVICE

I, Kathryn A. Pamentor, an Assistant Attorney General, do certify that I caused to be served this 24th day of May, 2013, the Notice of Motion and Motion for Extension of Time for Midwest Environmental Consulting Services, Inc. to Answer or Otherwise Respond to the Complaint upon (a) Scott E. Nemanich, Esq. and Timothy J. Rathbun, Esq. *via regular mail* at the addresses set forth below by placing a true and correct copy in an envelope, first class postage prepaid, and depositing same with the United States Postal Service at 100 West Randolph Street, Chicago, Illinois, at or before the hour of 5:00 p.m. and (b) Bradley P. Halloran, Esq. *via email*.

Via Regular Mail

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KATHRYN A. PAMENTER