

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

CELESTE TAPIA AND MICHAEL W.)
EDWARDS,)
))
Petitioner,)
))
v.)
))
MILLER CONTAINER CORPORATION,)
))
Respondent.)

PCB No. 2019-071

NOTICE OF FILING

To: Illinois Pollution Control Board
Attn: Clerk
100 West Randolph Street
Suite 11-500
Chicago, Illinois 60601-3218

Celeste Tapia
8621 35th Street West
Milan, Illinois 61264

Michael W. Edwards
8621 35th Street West
Milan, Illinois 61264

PLEASE TAKE NOTICE that on November 28, 2018, I electronically filed with the Office of the Clerk of the Illinois Pollution Control Board Respondent's **Motion for Extension of Time to File a Motion to Dismiss, Answer, or Otherwise Plead**; the **Appearances** of A. Bruce White, Joseph F. Madonia and Ashley E. Parr; and **Proof Service** of the same, copies of which are hereby served upon you.

Dated: November 28, 2018

MILLER CONTAINER CORPORATION

By: /s/ A. Bruce White
One of Its Attorneys

A. Bruce White
Joseph F. Madonia
Ashley E. Parr
BARNES & THORNBURG LLP
One North Wacker Drive
Suite 4400
Chicago, Illinois 60606
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Bruce.White@btlaw.com
Joseph.Madonia@btlaw.com
Ashley.Parr@btlaw.com

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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EDWARDS,)
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MILLER CONTAINER CORPORATION,)
))
Respondent.)

PCB No. 2019-071

APPEARANCE

The undersigned, Ashley E. Parr, an attorney, enters an appearance on behalf of Respondent, **Miller Container Corporation.**

Dated: November 28, 2018

MILLER CONTAINER CORPORATION

By: /s/ Ashley E. Parr
Ashley E. Parr

A. Bruce White
Joseph F. Madonia
Ashley E. Parr
BARNES & THORNBURG LLP
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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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)
MILLER CONTAINER CORPORATION,)
)
Respondent.)

PCB No. 2019-071

APPEARANCE

The undersigned, Joseph F. Madonia, an attorney, enters an appearance on behalf of Respondent, **Miller Container Corporation.**

Dated: November 28, 2018

MILLER CONTAINER CORPORATION

By: /s/ Joseph F. Madonia
Joseph F. Madonia

A. Bruce White
Joseph F. Madonia
Ashley E. Parr
BARNES & THORNBURG LLP
One North Wacker Drive
Suite 4400
Chicago, Illinois 60606
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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

CELESTE TAPIA AND MICHAEL W. EDWARDS,)
)
)
 Petitioner,)
)
 v.)
)
 MILLER CONTAINER CORPORATION,)
)
 Respondent.)

PCB No. 2019-071

APPEARANCE

The undersigned, A. Bruce White, an attorney, enters an appearance on behalf of Respondent, **Miller Container Corporation.**

Dated: November 28, 2018

MILLER CONTAINER CORPORATION

By: /s/ A. Bruce White
A. Bruce White

A. Bruce White
Joseph F. Madonia
Ashley E. Parr
BARNES & THORNBURG LLP
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4. Respondent requests this extension to allow Respondent time to investigate the nature of the claimed noise issues, to discuss the issues with Petitioners, and for Respondent's counsel to familiarize themselves with the issues in the case.

WHEREFORE, Respondent, Miller Container Corporation, requests that this Board grant it an extension of time up to and including Wednesday, January 16, 2019 in which to file a Motion to Dismiss, Answer, or otherwise respond to the Complaint.

Dated: November 28, 2018

MILLER CONTAINER CORPORATION

By: /s/A. Bruce White
One of Its Attorneys

A. Bruce White
Joseph F. Madonia
Ashley E. Parr
BARNES & THORNBURG LLP
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PROOF OF SERVICE

The undersigned attorney certifies, under penalties of perjury pursuant to 735 ILCS 5/1-109, that he caused copies of the foregoing **Notice of Filing, Motion for An Extension of Time to File a Motion to Dismiss, Answer, or to Otherwise Plead, and Appearances** to be served electronically via the Illinois Pollution Control Board's online filing system or via First Class Mail, postage paid, from One North Wacker Drive, Chicago, Illinois, on the 28th day of November, 2018 to:

Illinois Pollution Control Board
Attn: Clerk
100 West Randolph Street
Suite 11-500
Chicago, Illinois 60601-3218
(via electronic filing only)

Celeste Tapia
8621 35th Street West
Milan, Illinois 61264

Michael W. Edwards
8621 35th Street West
Milan, Illinois 61264

/s/ A. Bruce White

One of Its Attorneys