

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)	
)	
Complainant,)	
)	
v.)	PCB No. 13 - 12
)	(Enforcement – Air)
NACME STEEL PROCESSING, LLC,)	
a Delaware limited liability corporation,)	
)	
Respondent.)	

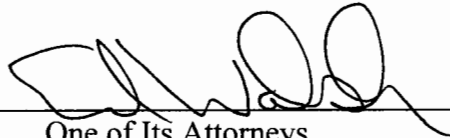
AGREED MOTION TO AMEND SCHEDULING ORDER FOR DISCOVERY

1. The current scheduling order in this case requires depositions to be completed by May 31, 2013 with other discovery deadlines following. (see attached order of April 23, 2013)
2. The parties have filed competing motions regarding discovery which have yet to be ruled on, to wit, the State’s Motion to Compel filed on May 7, 2013 and NACME’s Motion to Compel filed on May 8, 2013.
3. The parties hereby request an accommodation in the discovery schedule in order to allow sufficient time following rulings on the pending motions to complete discovery.
4. The parties request that the deadline for oral discovery be extended to a date 60 days beyond the date that all written discovery is completed pursuant to the Hearing Officer’s ruling on the parties competing discovery motions and the Plaintiff’s Motion for Protective Order; and that all other discovery deadlines be adjusted accordingly.

Respectfully Submitted,

NACME STEEL PROCESSING, L.L.C.,

Respondent

By: 
One of Its Attorneys

Edward V. Walsh, III
ReedSmith, LLP
10 South Wacker Drive
Suite 4000
Chicago, Illinois 60606
(312) 207-1000

CERTIFICATE OF SERVICE

I, the undersigned, certify that I have served the attached **AGREED MOTION TO AMEND SCHEDULING ORDER FOR DISCOVERY**, by e-mail and U.S. Regular Mail, upon the following persons:

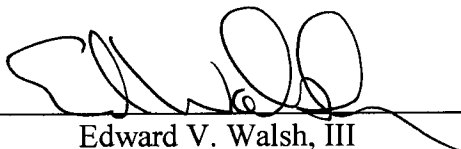
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Bradley P. Halloran, Hearing Officer
Illinois Pollution Control Board
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Chicago, Illinois 60601

**NACME STEEL PROCESSING, L.L.C.,
Respondent**

By:


Edward V. Walsh, III

Date: May 30, 2013