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CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that a true copy of the foregoing Notice of Filing and Midwest Generation LLC's Agreed Motion to Extend the Discovery Schedule and Modify the Discovery Order and Proposed Hearing Officer Order was filed electronically on August 20, 2015 with the following:

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

and that true copies were mailed by First Class Mail, postage prepaid, on August 20, 2015 to the parties listed on the foregoing Service List.

/s/ Jennifer T. Nijman

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

In the Matter of:)	
)	
SIERRA CLUB, ENVIRONMENTAL)	
LAW AND POLICY CENTER,)	
PRAIRIE RIVERS NETWORK, and)	
CITIZENS AGAINST RUINING THE)	
ENVIRONMENT,)	PCB No-2013-015
)	(Enforcement – Water)
Complainants,)	
)	
v.)	
)	
MIDWEST GENERATION, LLC,)	
)	
Respondent.)	

**AGREED MOTION TO EXTEND THE DISCOVERY SCHEDULE AND
MODIFY THE DISCOVERY ORDER**

Respondent, Midwest Generation, LLC, by and through counsel, requests that the Illinois Pollution Control Board Hearing Officer enter an order extending the discovery schedule, by agreement of the Parties. In support of its motion, Respondent states the following:

1. On June 9, 2014, the Hearing Officer entered an order establishing the discovery schedule for both Complainants and Respondent (collectively “the Parties”).
2. On February 4, 2015, Complainants filed an Agreed Motion to Extend the Discovery Schedule and a Proposed Order. On February 11, 2015, Hearing Officer Halloran granted the extension of the discovery schedule.
3. On April 29, 2015, Complainants requested and Respondent agreed to a Second Agreed Revised Discovery Schedule. On May 5, 2015, Hearing Officer Halloran accepted the schedule.
4. On August 19, 2015, Respondent requested and Complainants agreed to revise the discovery schedule and extend all dates by one month. A Proposed Discovery Order is attached.

WHEREFORE, Midwest Generation, LLC respectfully requests that the Hearing Officer accept the agreed proposed revised schedule:

- a. Respondent's written expert witness report(s) shall be served on or before October 1, 2015;
- b. Complainants' written expert witness reply(ies) shall be served on or November 1, 2015;
- c. Depositions of expert witnesses shall begin no earlier than December 1, 2015 and be completed on or before March 1, 2016;
- d. Dispositive motions shall be filed on or before May 1, 2016.

MIDWEST GENERATION, LLC.

By /s/ Jennifer T. Nijman
One of Its Attorneys

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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

In the Matter of:)	
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v.)	
)	
MIDWEST GENERATION, LLC,)	
)	
Respondent)	

PROPOSED HEARING OFFICE ORDER

The Parties have submitted an Agreed Motion to Extend the Discovery Schedule and Modify the Discovery Order. After reviewing the proposed amended discovery schedule and proposed amended scope of discovery, discovery shall be amended as follows:

- a. Respondent’s written expert witness report shall be served on or before October 1, 2015;
- b. Complainants’ written expert witness reply shall be served on or November 1, 2015;
- c. Depositions of expert witnesses shall begin no earlier than December 1, 2015 and be completed on or before March 1, 2016;
- d. Dispositive motions shall be filed on or before May 1, 2016.