### BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

### PEOPLE OF THE STATE OF ILLINOIS,

Complainant,

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PCB NO. 10-84 (Enforcement)

PROFESSIONAL SWINE MANAGEMENT, LLC, an Illinois limited liability corporation, HILLTOP VIEW, LLC, an Illinois limited liability corporation, WILDCAT FARMS, LLC, an Illinois limited liability corporation, HIGH-POWER PORK, LLC, an Illinois limited liability corporation, EAGLE POINT FARMS, LLC, an Illinois limited liability corporation, LONE HOLLOW, LLC, an Illinois limited liability) corporation, TIMBERLINE, LLC, an Illinois limited liability corporation, PRAIRIE STATE GILTS, LTD, an Illinois limited liability corporation,

**Respondents.** 

#### NOTICE OF ELECTRONIC FILING

To: See Attached Service List

PLEASE TAKE NOTICE that on July 22, 2013, I electronically filed with the Clerk of the Pollution Control Board of the State of Illinois, a MOTION FOR ADDITIONAL EXTENSION OF TIME, a copy of which is attached hereto and herewith served upon you.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS

LISA MADIGAN, Attorney General of the State of Illinois

MATTHEW J. DUNN, Chief Environmental Enforcement/Asbestos Litigation Division

BY

Jane E. McBride Sr. Assistant Attorney General Environmental Bureau

500 S. Second St. Springfield, IL 62706 217/782-9031

PEOPLE OF THE STATE OF ILLINOIS,	
) Complainant, )	
v. ) PROFESSIONAL SWINE ) MANAGEMENT, LLC, an Illinois ) limited liability corporation, and ) HILLTOP VIEW, LLC, an Illinois ) limited liability corporation, WILDCAT ) FARMS, LLC, an Illinois limited ) liability corporation, HIGH-POWER ) PORK, LLC, an Illinois limited liability ) corporation, EAGLE POINT FARMS, LLC, an ) Illinois limited liability corporation, ) LONE HOLLOW, LLC, an Illinois limited ) liability corporation, TIMBERLINE, LLC, ) an Illinois limited liability corporation, )	PCB NO. 10-84 (Enforcement)
PRAIRIE STATE GILTS, LTD, an Illinois )   corporation, LITTLE TIMBER, LLC, an )   Illinois limited liability corporation )	

### BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

Respondents.

### MOTION FOR ADDITIONAL EXTENSION OF TIME

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NOW COMES, Complainant, PEOPLE OF THE STATE OF ILLINOIS, ex rel Lisa

Madigan, Attorney General of the State of Illinois, and moves for an additional extension of time

within which to file responses to Respondents' motions to sever and affirmative defenses.

1. On June 18, 2013, Complainant received an Answer to the Second Amendment

Complaint and Affirmative Defenses from eight of the nine Respondents in this matter. Seven of the facility respondents also filed a motion to sever.

2. On July 2, 2013, Complainant filed a motion for extension of time, until July 23,

2013, in which to respond to Respondents' motions to sever and affirmative defenses. Counsel for the Respondents indicated they had no objection to the request.

3. Complainant respectfully requests an additional week in which to respond.

Complainant's request for additional time is based on the same grounds as the original request,

that being, that the volume of filings and questions of law raised in the motions and affirmative

defenses are significant in light of obligations entailed in Complainant's counsel's already

existing workload.

4. Counsel for the Respondents have been apprised of the Complainant's intent to request an additional extension of time, of one week, and have indicated that they have no objection.

WHEREFORE, on the foregoing grounds, Complainant respectfully requests an additional extension of time, until July 30, 2013, to file responsive pleadings.

Respectfully submitted, PEOPLE OF THE STATE OF ILLINOIS, <u>ex rel</u>. LISA MADIGAN, Attorney General of the State of Illinois

MATTHEW J. DUNN, Chief Environmental Enforcement Division

BY:

JANE E. MCBRIDE

Sr. Assistant Attorney General

500 South Second Street Springfield, Illinois 62706 (217) 782-9031

### **CERTIFICATE OF SERVICE**

I hereby certify that I did on July 22, 2013, cause to be served by First Class Mail, with postage thereon fully prepaid, by depositing in a United States Post Office Box in Springfield, Illinois, a true and correct copy of the following instruments entitled MOTION FOR ADDITIONAL EXTENSION OF TIME upon the persons listed on the Service List.

Sr. Assistant Attorney General

This filing is submitted on recycled paper.

#### SERVICE LIST

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Carol Webb Hearing Officer Illinois Pollution Control Board 1021 North Grand Avenue East Springfield, IL 62794