

**ILLINOIS INDEPENDENT
TAX TRIBUNAL**

WASTE MANAGEMENT OF)	
ILLINOIS, INC.,)	
)	
Petitioner,)	Chief Judge James M. Conway
)	
v.)	No. 15-TT-130
)	
THE ILLINOIS DEPARTMENT OF)	
REVENUE,)	
)	
Respondent.)	

NOTICE OF FILING

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PLEASE TAKE NOTICE, that on May 24, 2016, the undersigned representatives for the Illinois Department of Revenue (the "Department") filed its Unopposed Motion For An Extension To File The Department's Cross-Motion For Summary Judgment And Response with the Illinois Independent Tax Tribunal, located at 160 North LaSalle Street, Room N506, Chicago, IL 60601, by filing its Motion via email.

Respectfully,
/s/Michael Coveny
Michael Coveny

/s/Seth J. Schriftman
Seth J. Schriftman

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that he served a copy of this Notice of Motion and the document therein mentioned on the parties set forth above by email on May 24, 2016.

/ Seth J. Schriftman
Seth J. Schriftman

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THE ILLINOIS DEPARTMENT OF REVENUE,)	
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**Unopposed Motion For An Extension To File The Department’s Cross-Motion For
Summary Judgment And Response**

NOW COMES the Illinois Department of Revenue (“Department”), by and through its Special Assistant Attorneys General, Michael Coveny and Seth Schrifman, and moves this Tribunal for an order granting it a continuance to file its Cross-Motion for Summary Judgment and Response. In support of this Motion, the Department states as follows:

1. On March 17, 2016, the Tribunal ordered that:
 1. The Petitioner has 45 days to file its Motion for Summary Judgment;
 2. The Department will have 30 days thereafter to file its Motion for Summary Judgment and Response to the Petitioner’s Motion; and
 3. The Petitioner will have 15 days thereafter to file a Reply; and
 4. The next status conference will be held on June 21, 2016 at 9:00 a.m. by telephone.
2. The Department’s Cross-Motion for Summary Judgment and Response is currently due on June 1, 2016.

3. The Department represents that it has been working on its Motion consistently and in good faith since the issuance of the Tribunal's Order on March 17, 2016, before it received the Petitioner's Motion.

4. While the Department anticipates being as efficient as possible in its filing, due to the nature and complexity of this matter, the Department anticipates filing a comprehensive Motion.

5. The Department litigators also have other time-sensitive matters within the next several weeks.

6. The Department contacted Petitioner's counsel on May 24, 2016 and counsel stated that they would not oppose this Motion to Extend for a period of three-weeks from the current due date, with the Petitioner's Reply due thereafter.

7. Thus, the Department respectfully requests that its Cross-Motion and Response be due by or before June 22, 2016 (21 days from its current due date), the Petitioner's Reply be due 15 days thereafter, and that the next status conference be held thereafter at the Tribunal's convenience.

8. By allowing the Department this extension, neither party will be prejudiced.

9. This Motion is unopposed and made in good faith.

WHEREFORE, the Illinois Department of Revenue respectfully requests that an order be entered (1) granting it leave to file its Cross-Motion for Summary Judgment and Response in this matter on or before June 22, 2016; (2) allowing Petitioner to file its Reply brief 15 days thereafter as indicated in the original Order, (3) postponing the status hearing thereafter at a time that is convenient to the Tribunal; and (4) for such other relief as this Tribunal deems just and proper.

Dated: May 24, 2016

Respectfully submitted,
State of Illinois, Department of Revenue

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Special Assistant Attorney General

By: /s/ Michael Coveny
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