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**In The Illinois Independent Tax Tribunal**  
**Cook County, Illinois**

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**INNOPHOS HOLDINGS INC.,**

*Petitioner,*

v.

**ILLINOIS DEPARTMENT OF REVENUE,**

*Respondent.*

14 TT 214

Chief Judge JAMES M. CONWAY,  
Judge Presiding.

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**CONSENT MOTION OF PETITIONER, INNOPHOS HOLDINGS  
INC., FOR FIRST EXTENSION OF TIME TO FILE ITS MOTION  
FOR SUMMARY JUDGMENT**

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Petitioner, Innophos Holdings, Inc., (“Innophos”) with the consent of the Respondent, moves that the Illinois Independent Tax Tribunal extend the time for briefing regarding its Motion for Summary Judgment by 30 days. Pursuant to an Order entered by this Tribunal on March 3, 2015, the current briefing schedule is as follows:

May 8, 2015 – Petitioner’s Motion is due;

June 9, 2015 – Department’s Response is due;

June 23, 2015 – Petitioner’s Reply is due; and

July 16, 2015 – Oral Argument will be heard at 2:30 p.m.

Petitioner requests the briefing schedule to be modified as follows:

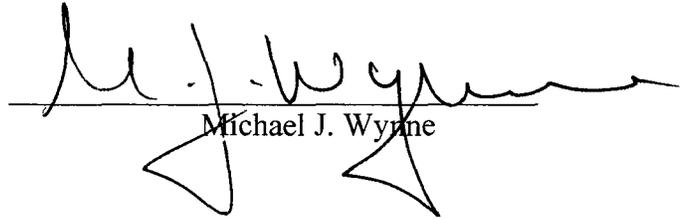
June 8, 2015 – Petitioner’s Motion is due;

July 9, 2015 – Department’s Response is due;

July 23, 2015 – Petitioner’s Reply is due; and

\_\_\_\_\_ – Oral Argument will be heard at \_\_\_\_\_ p.m.

In support of this motion, the affidavit of Michael J. Wynne is attached.



Michael J. Wynne

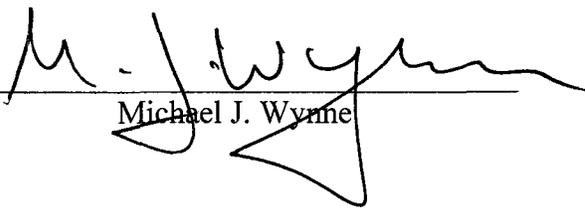
Michael J. Wynne  
Adam P. Beckerink  
REED SMITH LLP  
10 South Wacker Drive, Suite 4000  
Chicago, Illinois 60606  
(312) 207-1000

*Attorneys for Petitioner, Innophos Holdings, Inc.*



6. For the reasons stated above, I respectfully ask the Tribunal grant the Petitioner an extension with regard to the briefing schedule for its Motion for Summary Judgment.

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that the undersigned verily believes the same to be true.

  
Michael J. Wynne

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**In The Illinois Independent Tax Tribunal**

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*Petitioner,*

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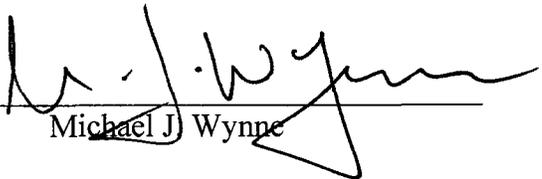
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**NOTICE OF FILING**

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TO: See Attached Certificate of Service

**PLEASE TAKE NOTICE** that on May 6, 2015, I caused to be filed with the Illinois Independent Tax Tribunal, the **CONSENT MOTION OF PETITIONER, INNOPHOS HOLDINGS INC., FOR FIRST EXTENSION OF TIME TO FILE ITS MOTION FOR SUMMARY JUDGMENT**, a copy of which is attached hereto and herewith served upon you.

  
\_\_\_\_\_  
Michael J. Wynne

Michael J. Wynne  
Adam P. Beckerink  
REED SMITH LLP  
10 South Wacker Drive, Suite 4000  
Chicago, Illinois 60606  
(312) 207-1000

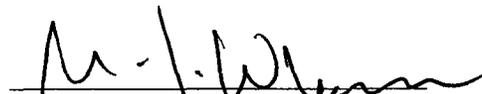
**CERTIFICATE OF SERVICE**

The undersigned, an attorney, does hereby certify that I caused the **CONSENT MOTION OF PETITIONER, INNOPHOS HOLDINGS INC., FOR FIRST EXTENSION OF TIME TO FILE ITS MOTION FOR SUMMARY JUDGMENT** to be served upon:

Jonathan M. Pope, Special Assistant Attorney General – State of Illinois  
100 West Randolph Street, 7-900  
Chicago, Illinois 60601  
(312) 814-3185  
*Attorney for Respondent*

by Messenger Delivery on May 6, 2015.

By:

  
Michael J. Wynne  
Under penalties as provided by law pursuant to 735 ILCS 5/1-109, I certify that the statements set forth herein are true and correct.