

IN THE ILLINOIS INDEPENDENT TAX TRIBUNAL

GRAND TRUNK WESTERN RAILROAD COMPANY, )  
FOR ITSELF AND AS SUCCESSOR TO GRAND )  
TRUNK WESTERN RAILROAD INC. )

Petitioner, )

v. )

ILLINOIS DEPARTMENT OF REVENUE, )

Respondent. )

15 TT 68

Judge Brian F. Barov

NOTICE OF FILING

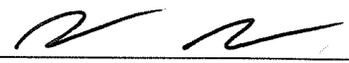
TO: See attached Certificate of Service.

**PLEASE TAKE NOTICE THAT** on August 6, 2015, Petitioner, Grand Trunk Western Railroad Company, for itself and as successor to Grand Trunk Western Railroad Inc., and Respondent, Illinois Department of Revenue, filed with the Illinois Independent Tax Tribunal, 160 N. LaSalle Street, Room N506, Chicago, Illinois, a copy of the **JOINT MOTION FOR EXTENSION OF THE DISCOVERY RESPONSE DATE**, a copy of which is attached and served upon you herewith.

Respectfully submitted,

**GRAND TRUNK WESTERN RAILROAD  
COMPANY**

Petitioner

By: 

One of Petitioner's Attorneys

Fred O. Marcus (fmarcus@hmblaw.com)  
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TRUNK WESTERN RAILROAD INC.	)	
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	)	Judge Brian F. Barov
ILLINOIS DEPARTMENT OF REVENUE,	)	
	)	
Respondent.	)	

**JOINT MOTION FOR EXTENSION OF TIME TO RESPOND TO DISCOVERY**

Petitioner, Grand Trunk Western Railroad Company, for itself and as successor to Grand Trunk Western Railroad Inc. ("Petitioner"), by its attorneys Horwood Marcus & Berk Chartered, and Respondent, the Illinois Department of Revenue ("Department" or "Respondent"), by its attorney, Lisa Madigan, Attorney General of and for the State of Illinois, hereby respectfully move this Tribunal for an extension of the written discovery response date from August 10<sup>th</sup>, 2015 to September 11<sup>th</sup>, 2015. In support of its motion, the Parties state the following:

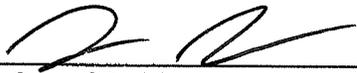
1. On April 9, 2015, Petitioner filed its Petition.
2. On May 22, 2015, the Department filed its Answer.
3. On May 27, 2015, the Tribunal granted the Parties 30 days to issue written discovery and 30 days from the service of written discovery to respond.
4. On June 26, 2015, the Tribunal granted an extension of time to tender written discovery until July 10, 2015 and an extension of time to respond to written discovery requests until August 10, 2015.
5. On July 10, 2015, both Petitioner and Respondent served their First Set of Interrogatories and First Request for Production of Documents.

6. Due to the volume of documents and information requested by both parties, Petitioner and Respondent have encountered unexpected delays in gathering documents and information in response to the discovery requests.
7. Further, Petitioner's personnel necessary to gather the documents and information was on vacation during much of the discovery response period, resulting in delay.
8. In light of this, counsel for the Petitioner conferred with counsel for the Respondent and both agreed to bring this motion to extend the deadline for parties to respond to all outstanding discovery.
9. This motion is not brought for purposes of delay and no prejudice will result to either Petitioner or Respondent if this motion is granted.

**WHEREFORE**, the Parties respectfully move this Tribunal for an extension of the written discovery response date from August 10<sup>th</sup>, 2015 to September 11<sup>th</sup>, 2015.

Respectfully Submitted,

**GRAND TRUNK WESTERN RAILROAD  
COMPANY**  
Petitioner

By:   
One of Petitioner's Attorneys

Fred O. Marcus (fmarcus@hmblaw.com)  
David A. Hughes (dhughes@hmblaw.com)  
Samantha K. Breslow (sbreslow@hmblaw.com)  
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**LISA MADIGAN**  
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State of Illinois

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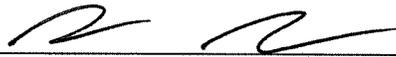
Email: Daniel.Edelstein@Illinois.gov

Sean.Cullinan@Illinois.gov

**CERTIFICATE OF SERVICE**

Undersigned counsel of record hereby certifies that she caused a copy of the foregoing present **Joint Motion For Extension of the Discovery Response Date** to be served on other counsel of record by electronic mail and also by enclosing the same in an envelope, properly addressed, first-class postage prepaid and deposited in the U.S. Mail at 500 W. Madison Street, Chicago, Illinois 60661, before the hour of 5:00 p.m. on the 6<sup>th</sup> day of August, 2015, addressed as follows:

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Daniel A. Edelstein  
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Illinois Department of Revenue  
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