

ILLINOIS COMMERCE COMMISSION

2012 MAY 29 11: 21

CHIEF CLERK'S OFFICE

S. GORECZNY, )  
)  
vs. ) NO. 12-0099  
)  
COMMONWEALTH EDISON, )  
)  
Complaint as to non-emergency )  
Vegetation management activities in )  
Bolingbrook, Illinois )

**COMPLAINANT'S MOTION TO EXTEND TIME TO  
RESPOND TO MOTION TO DISMISS**

NOW COMES the Complainant, S. GORECZNY, and files Complainant's Motion to Extend Time to Respond. In support of her motion, the Complainant states as follows:

1. On February 6, 2012, the Complainant filed her Formal Complaint against Commonwealth Edison Company (hereafter referred to as "ComEd") relative to its non-emergency vegetation management activities in Bolingbrook, Illinois.

2. On or about April 16, 2012, the Respondent, ComEd, filed its Motion to Dismiss Formal Complaint.

3. On May 2, 2012, by administrative law judge ruling, the Complainant was granted 28 days to file a response to ComEd's Motion to Dismiss.

4. On May 16, 2012, the Complainant served upon the Respondent's attorney a Production Request and Interrogatories for ComEd to answer. By previous order, ComEd was given to June 17, 2012 to reply to the Complainant's discovery requests.

5. Until the Complainant receives the Respondent's answers to her discovery requests, the Complainant is unable to properly respond to the Motion to Dismiss. The information sought by Complainant is relevant to the pending Motion.

6. The Respondent will not be prejudiced by any extension of time to allow Complainant to respond.

WHEREFORE, the Complainant, S. GORECZNY, requests that she be granted additional time, or to and including July 16, 2012, to respond to ComEd's Motion to Dismiss.

Respectfully submitted,

  
\_\_\_\_\_  
S. GORECZNY, Complainant

S. Goreczny, Complainant  
819 Wescott Rd.  
Bolingbrook, IL 60603

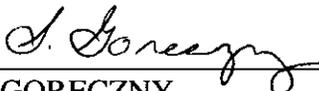
**STATE OF ILLINOIS**  
**ILLINOIS COMMERCE COMMISSION**

<b>S. Goreczny</b>	)	
<b>-vs-</b>	)	<b>12-0099</b>
<b>Commonwealth Edison Company</b>	)	
	)	
<b>Complaint as to non-emergency</b>	)	
<b>vegetation management activities in</b>	)	
<b>Bolingbrook, Illinois.</b>	)	

**NOTICE OF FILING**

TO: Parties on Certificate of Service

PLEASE TAKE NOTICE that on May 24, 2012, I filed with the Chief Clerk of the Illinois Commerce Commission a copy of Complainant's Motion to Extend Time to Respond to Motion to Dismiss, a copy of which is hereby served upon you.

  
\_\_\_\_\_  
S. GORECZNY  
819 Westcott Rd.  
Bolingbrook, IL 60440

**CERTIFICATE OF SERVICE**

I hereby certify that on May 24, 2012, I served a copy of the foregoing Complainant's Motion to Extend Time to Respond to Motion to Dismiss by causing copies thereof to be placed in the U.S. Mail, first class postage affixed, to each of the parties as indicated below:

Ms. Elizabeth A. Rolando  
Chief Clerk  
Illinois Commerce Commission  
527 East Capitol Avenue  
Springfield, IL 62701

Mark L. Goldstein  
Attorney for Respondent  
3019 Province Circle  
Mundelein, IL 60060

Ms. Bonita Benn  
Administrative Law Judge  
Illinois Commerce Commission  
160 N. LaSalle St., Ste. C-800  
Chicago, IL 60601

  
\_\_\_\_\_  
S. GORECZNY