

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

SHREE KUBER INC.,	)	
	)	
Petitioner,	)	
	)	
v.	)	PCB 21-03
	)	PCB 21-05
ILLINOIS ENVIRONMENTAL	)	(UST Appeal)
PROTECTION AGENCY,	)	(Consolidated)
	)	
Respondent.	)	

**NOTICE OF FILING**

TO: Don Brown	Carol Webb
Clerk of the Board	Hearing Officer
Illinois Pollution Control Board	Illinois Pollution Control Board
James R. Thompson Center	1021 North Grand Avenue East
100 West Randolph, Suite 11-500	Post Office Box 19274
Chicago, Illinois 60601	Springfield, Illinois 62794-9274
<b>(VIA ELECTRONIC MAIL)</b>	<b>(VIA ELECTRONIC MAIL)</b>

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Illinois Pollution Control Board a **MOTION TO DISMISS**, a copy of which is herewith served upon you.

Respectfully submitted,

Shree Kuber, Inc.  
Petitioner,

DATE: November 24, 2021

By:     /s/ Melissa S. Brown      
One of Its Attorneys

Jennifer M. Martin  
Melissa S. Brown  
HEPLERBROOM, LLC  
4340 Acer Grove Drive  
Springfield, IL 62711  
[Jennifer.Martin@heplerbroom.com](mailto:Jennifer.Martin@heplerbroom.com)  
[Melissa.Brown@heplerbroom.com](mailto:Melissa.Brown@heplerbroom.com)  
(217) 528-3674

**CERTIFICATE OF SERVICE**

I, Melissa S. Brown, the undersigned, hereby certify that I have served the attached

**MOTION TO DISMISS** on:

Don Brown  
Clerk of the Board  
Illinois Pollution Control Board  
James R. Thompson Center  
100 West Randolph Street, Suite 11-500  
Chicago, Illinois 60601

Carol Webb  
Hearing Officer  
Illinois Pollution Control Board  
1021 North Grand Avenue East  
Post Office Box 19274  
Springfield, Illinois 62794-9274

Melanie Jarvis  
Assistant Counsel  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, Illinois 62794

That my email address is [Melissa.Brown@heplerbroom.com](mailto:Melissa.Brown@heplerbroom.com)

That the number of pages in the email transmittal is 3 pages.

That the email transmission took place before 5:00 p.m. on the date of November 24, 2021.

/s/ Melissa S. Brown  
Melissa S. Brown

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

SHREE KUBER INC.,	)	
	)	
Petitioner,	)	
	)	
v.	)	PCB 21-03
	)	PCB 21-05
ILLINOIS ENVIRONMENTAL	)	(UST Appeal)
PROTECTION AGENCY,	)	(Consolidated)
	)	
Respondent.	)	

**MOTION TO DISMISS**

NOW COMES Petitioner, SHREE KUBER INC., by and through its attorneys, and pursuant to 35 Ill. Adm. Code 101.500, asks the Illinois Pollution Control Board (“Board”) to dismiss these UST appeals with prejudice, stating as follows:

Petitioner no longer seeks to appeal the Respondent’s June 30, 2020 UST decision and Respondent’s June 30, 2020 Reimbursement decision.

WHEREFORE, Petitioner prays for an Order from the Board dismissing these matters with prejudice and closing the dockets, with each party to bear its own costs and fees.

Respectfully submitted,

Shree Kuber, Inc.  
Petitioner,

DATE: November 24, 2021

By:     /s/ Melissa S. Brown      
One of Its Attorneys

Jennifer M. Martin  
Melissa S. Brown  
HEPLERBROOM, LLC  
4340 Acer Grove Drive  
Springfield, IL 62711  
[Jennifer.Martin@heplerbroom.com](mailto:Jennifer.Martin@heplerbroom.com)  
[Melissa.Brown@heplerbroom.com](mailto:Melissa.Brown@heplerbroom.com)  
(217) 528-3674