### BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:

PRAIRIE RIVERS NETWORK,	)	
by and for its members,	)	
SIERRA CLUB, ILLINOIS	)	
CHAPTER, by and for its members	)	
	)	
	)	
Complainant,	)	
	)	
v.	)	PCB 2010-061
	)	(Enforcement-Water)
FREEMAN UNITED COAL	)	
MINING CO., L.L.C., and	)	
SPRINGFIELD COAL CO., L.L.C.	)	
	)	
Respondents.	)	

# **NOTICE OF ELECTRONIC FILING**

To: Attached Service List

PLEASE TAKE NOTICE that on August 27, 2014, I electronically filed with the Clerk of the Pollution Control Board of the State of Illinois, MOTION TO WITHDRAW, a copy of which is attached hereto and herewith served upon you.

Respectfully Submitted,

Lindsey Trachtenberg

Associate Attorney

Environmental Law and Policy Center 35 East Wacker Drive, Ste. 1300

Chicago, IL 60601

312-795-3706

#### BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:

PRAIRIE RIVERS NETWORK,	)	
by and for its members,	)	
SIERRA CLUB, ILLINOIS	)	
CHAPTER, by and for its members	)	
	)	
	)	
Complainant,	)	
	)	
v.	)	PCB 2010-061
	)	(Enforcement-Water)
FREEMAN UNITED COAL	)	
MINING CO., L.L.C., and	)	
SPRINGFIELD COAL CO., L.L.C.	)	
	)	
Respondents.	)	

### **MOTION TO WITHDRAW**

Lindsey Trachtenberg of the Environmental Law & Policy Center ("ELPC") hereby moves to withdraw as one of the counsel for Sierra Club and Prairie Rivers Network. Lindsey Trachtenberg is leaving ELPC, though she will retain her law license. Sierra Club and Prairie Rivers Network continue to be represented in this matter by Jessica Dexter of ELPC, who is lead counsel. Thus, this withdrawal will not delay these proceedings, nor will it be inequitable to any party. Sierra Club's and Prairie Rivers Network's interests also will be protected, and they will not be prejudiced as a result of the withdrawal.

WHEREFORE, Lindsey Trachtenberg respectfully requests that the Board grant her motion to withdraw as one of the counsel for Sierra Club and Prairie Rivers Network.

Dated: August 27, 2014

Respectfully submitted,

Lindsey Trachtenberg

Associate Attorney

Environmental Law & Policy Center 35 East Wacker Drive, Suite 1600

Chicago, IL 60601

(312) 795-3712

## **CERTIFICATE OF SERVICE**

I, Lindsey Trachtenberg, hereby certify that I have filed the attached **NOTICE OF ELECTRONIC FILING** and **MOTION TO WITHDRAW** in PCB 2010-061 upon the attached service list by depositing said documents in the United States Mail, postage prepaid, in Chicago, Illinois on August 27, 2014.

Respectfully submitted,

Exnolsey hachtenberg

Lindsey Trachtenberg

Associate Attorney

Environmental Law and Policy Center 35 East Wacker Drive, Suite 100

Chicago, IL 60601 312-795-3706

### **SERVICE LIST**

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

E. Lynn Grayson Steven M. Siros Allison A. Torrence Jenner & Block LLP 353 N. Clark Street Chicago, IL 60654

Thomas A. Korman, R.A. Freeman United Coal Mining Company, LLC 222 N. LaSalle Street Suite 800 Chicago IL 60601 Thomas H. Shepherd - Asst Atny Genl Office of the Attorney General 69 W. Washington Street, Suite 1800 Chicago, IL 60602

Dale A. Guariglia
John R. Kindschuh
Erin L. Brooks
Bryan Cave, LLP
One Metropolitan Square
211 North Broadway, Suite 3600
St. Louis, MO 63102

BCRA Co., R.A. Springfield Coal Company, LLC 161 N Clark St, Suite 4300 Chicago, IL 60601