Electronic Filing - Received, Clerk's Office: 10/02/2015

BEFORE THE POLLUTION CONTROL BOARD OF THE STATE OF ILLINOIS

ESTATE OF GERALD D.)	
SLIGHTOM,)	
Petitioner,)	
v.)	PCB No. 11-25
)	(LUST Permit Appeal)
ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY,)	
Respondent.)	

NOTICE OF FILING AND PROOF OF SERVICE

TO: John T. Therriault, Acting Clerk
Illinois Pollution Control Board
100 West Randolph Street
State of Illinois Building, Suite 11-500
Chicago, IL 60601

Carol Webb
Hearing Officer
Illinois Pollution Control Board
1021 N. Grand Avenue East
P.O. Box 19274

Melanie Jarvis Illinois Environmental Protection Agency 1021 N. Grand Avenue East P.O. Box 19276 Springfield, IL 62794-9276

PLEASE TAKE NOTICE that I have today electronically filed with the Office of the Clerk of the Illinois Pollution Control Board, pursuant to Board Procedural Rule 101.302 (d), a MOTION TO SUPPLEMENT MOTION FOR AUTHORIZATION OF PAYMENT OF ATTORNEY'S FEES, a copy of which is herewith served upon the hearing officer and upon the attorneys of record in this cause.

The undersigned hereby certifies that a true and correct copy of this Notice of Filing, together with a copy of the document described above, were today served upon the hearing officer and counsel of record of all parties to this cause by enclosing same in envelopes addressed to such attorneys and to said hearing officer with postage fully prepaid, and by depositing said envelopes in a U.S. Post Office Mailbox in Springfield, Illinois on the 2nd day of October, 2015.

BY: /s/ Patrick D. Shaw

Springfield, IL 62794-9274

LAW OFFICE OF PATRICK D. SHAW 80 Bellerive Road Springfield, IL 62704 217-299-8484 Electronic Filing - Received, Clerk's Office: 10/02/2015

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MOTION TO SUPPLEMENT MOTION FOR AUTHORIZATION OF PAYMENT OF ATTORNEY'S FEES

NOW COMES Petitioner, ESTATE OF GERALD D. SLIGHTOM, by its undersigned counsel, and pursuant to Section 101.500 of the Board's Procedural Rules (35 III. Adm. Code § 101.500), moves to supplement a previously-filed motion, stating as follows:

- 1. On September 28, 2015, Petitioner filed Petitioner's Motion for Authorization of Payment of Attorney's Fees as Costs of Corrective Action.
 - 2. Inadvertently, page 15 of Exhibit A-1 was omitted.
 - 3. Attached hereto is a true and correct copy of page 15 of Exhibit A-1.
- 4. Undersigned counsel does not believe any undue prejudice will be posed in granting this motion, as Respondent has been given until October 19, 2015 to respond to the request for reimbursement of legal defense costs. (Order of Sept. 3, 2015)

WHEREFORE, Petitioner, prays for an order from the Board or Hearing Officer granting Petitioner leave to supplement the aforesaid motion with the omitted page of the exhibit, or such other relief as deemed meet and just.

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Respectfully submitted,

ESTATE OF GERALD D. SLIGHTOM Petitioner,

BY: LAW OFFICE OF PATRICK D. SHAW Its attorneys

BY: /s/ Patrick D. Shaw

Patrick D. Shaw LAW OFFICE OF PATRICK D. SHAW 80 Bellerive Road Springfield, IL 62704 217-299-8484

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CSD Environmental Services Page 15

	_	Hrs/Rate	Amount
SUBTOTAL:	[6.30	1,165.50]
November 2013			
11/20/2013 Receive & review Board order denying motion to dismiss; e-mail opinion to client w/ comments; receive e-mail questions from client and send reply		0.60 185.00/hr	111.00
11/21/2013 Telephone Melanie Jarvis; e-mail to client re Agency position and options		1.00 185.00/hr	185.00
11/22/2013 Telephone conf. w/ Jarvis about mtg w/ Kim; e-mail to client re Agency positions; receive e-mail from client and respond		0.90 185.00/hr	166.50
Research Board procedures for excess payments; draft memo; e-mail to client, responding to questions and forwarding memo		3.20 185.00/hr	592.00
11/27/2013 Briefing to PDS.		0.20 230.00/hr	46.00
SUBTOTAL:	[5.90	1,100.50]
December 2013			
12/2/2013 E-mail to client opinion on filing motion for reconsideration		0.50 185.00/hr	92.50
12/3/2013 E-mail to Jarvis re intent to file motion for reconsideration		0.10 185.00/hr	18.50
Telephone conference Hrg Officer and IEPA atty		0.10 185.00/hr	18.50
12/6/2013 Receive & review Hrg Officer Order		0.10 185.00/hr	18.50
12/9/2013 Review file and begin preparing motion for reconsideration		2.70 185.00/hr	499.50
12/10/2013 E-mail to client re status of payment; several e-mails re same; review docs received		0.80 185.00/hr	148.00
12/11/2013 Research authority of A.G. / lawyer to control litigation		4.50 185.00/hr	832.50
12/12/2013 Research reconisderation caselaw; draft motion for reconsideration		4.50 185.00/hr	832.50
12/13/2013 Draft and file waiver of decision deadline		0.10 185.00/hr	18.50