

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

PEOPLE OF THE STATE OF ILLINOIS, )  
)  
Complainant, )  
)  
v. ) PCB No. 11-50  
)  
CITY OF MORRIS, an Illinois municipal ) (Enforcement-Land)  
corporation, and COMMUNITY LANDFILL )  
COMPANY, INC., a dissolved Illinois corporation, )  
)  
Respondents. )

**NOTICE OF FILING**

**TO:** Christopher Grant, Assistant Attorney General, Environmental Bureau, 69 W. Washington Street, 18<sup>th</sup> Floor, Chicago, IL 60602 [cgrant@atg.state.il.us](mailto:cgrant@atg.state.il.us)

Richard Porter, Hinshaw & Culbertson LLP, 100 Park Avenue, P. O. Box 1389, Rockford, IL 61105-1389 [rporter@hinshawlaw.com](mailto:rporter@hinshawlaw.com)

Scott Belt, Belt, Dearth & Associates, 105 E. Main St., Suite 206, Morris, IL 60450 [scottbelt@comcast.net](mailto:scottbelt@comcast.net)

PLEASE TAKE NOTICE that on April 23, 2020, the UNOPPOSED MOTION FOR LEAVE TO WITHDRAW AS ATTORNEYS OF RECORD FOR RESPONDENT COMMUNITY LANDFILL COMPANY, INC., a dissolved Illinois corporation, was electronically filed with the Illinois Pollution Control Board, a copy of which is attached and hereby served upon you.

/s Mark A. LaRose  
Mark A. LaRose

Mark A. LaRose  
ARDC No. 06183288  
LaRose & Bosco, Ltd.  
*Attorney for Respondent*  
*Community Landfill Company, Inc.*  
200 N. LaSalle Street, Suite 2810  
Chicago, IL 60601  
(312) 642-4414  
[mlarose@laroseboscoblaw.com](mailto:mlarose@laroseboscoblaw.com)

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COMPANY, INC., a dissolved Illinois corporation,	)	
	)	
Respondents.	)	

**UNOPPOSED MOTION FOR LEAVE  
TO WITHDRAW AS ATTORNEYS OF RECORD**

Respondent, Community Landfill Company, Inc., a dissolved Illinois corporation, and its counsel Mark A. LaRose and LaRose & Bosco, Ltd., hereby move for Mark A. LaRose and LaRose & Bosco, Ltd. to withdraw as counsel for Respondent Community Landfill Company, Inc., a dissolved Illinois corporation in this matter. In support hereof, Respondent Community Landfill Company, Inc., a dissolved Illinois corporation (hereinafter CLC), states as follows:

1. Respondent CLC is a defunct Illinois corporation.
2. Mark A. LaRose has been CLC's counsel in this case since April 19, 2011 when he filed his appearance.
3. Respondent CLC is a defunct corporation with no assets.
4. Respondent CLC (based on its former officers' representations to the undersigned) has no funds to continue to defend this case, and it has been unable to pay outstanding fees to LaRose & Bosco.

5. Respondent CLC's former officers are Robert Pruim and Edward Pruim. Based on the following representations made to the undersigned, they are physically unable to actively participate in this case on behalf of CLC due to their respective health issues.

(a) Based on Edward Pruim's representations made to the undersigned, he is unemployed. He has a rare neurological disease that prevents him from standing for more than a few seconds without passing out, and he has no physical ability to actively participate in this case in any manner.

(b) Based on Robert Pruim's representations made to the undersigned, he is unemployed and has a congenital heart condition that prevents him from working and will prevent him from actively participating in this case.

6. Respondent CLC, by and through its former officers, consents to the withdrawal of Mark A. LaRose and LaRose & Bosco, Ltd. as its counsel in this case.

7. Pursuant to Illinois Rules of Professional Conduct, Rule 1.16(b)(5), (6) and (7), the Respondent CLC has substantially failed to fulfill its obligation as to LaRose & Bosco, Ltd.'s fees and expenses for services, lack of payment by Respondent CLC for LaRose & Bosco, Ltd.'s services will result in an unreasonable financial burden to LaRose & Bosco, Ltd., CLC's former officers (based on their respective representations) are unable to actively participate in this case due to their respective health issues, and Respondent CLC by and through its former officers, consent to this Motion.

8. On April 1, 2020, at a telephone status conference before Hearing Officer Halloran and all parties of record, the undersigned stated its intent to withdraw as counsel, and no one objected to same.

9. On April 16, 2020, the undersigned forwarded this Motion to counsel of record for the City of Morris, Scott Belt and Rick Porter, and to counsel of record for the People of the State of Illinois, Chris Grant, and said counsel had no objection to this Motion.

**WHEREFORE**, Respondent Community Landfill Company, Inc., a dissolved Illinois corporation, and Mark A. LaRose and LaRose & Bosco, Ltd. respectfully request that this Board GRANT its Unopposed Motion for Leave to Withdraw as Attorneys of Record for Respondent Community Landfill Company, Inc., a dissolved Illinois corporation.

Respectfully submitted,

/s Mark A. LaRose  
Mark A. LaRose

Mark A. LaRose  
ARDC No. 06183288  
LaRose & Bosco, Ltd.  
*Attorney for Respondent*  
*Community Landfill Company, Inc.*  
200 N. LaSalle Street, Suite 2810  
Chicago, IL 60601  
(312) 642-4414  
[mlarose@laroseboscoblaw.com](mailto:mlarose@laroseboscoblaw.com)

**CERTIFICATE OF SERVICE**

The undersigned, an attorney, states that on this 23<sup>rd</sup> day of April, 2020, he caused a copy of the foregoing UNOPPOSED MOTION FOR LEAVE TO WITHDRAW AS ATTORNEYS OF RECORD FOR RESPONDENT COMMUNITY LANDFILL COMPANY, INC., a dissolved Illinois corporation, to be served on all counsel of record as listed below by e-mail:

Attorney for Complainant People of the State of Illinois

Christopher Grant  
Assistant Attorney General  
Environmental Bureau  
69 W. Washington St., 18<sup>th</sup> Floor  
Chicago, IL 60602  
[cgrant@atg.state.il.us](mailto:cgrant@atg.state.il.us)

Attorneys for Respondent City of Morris

Richard Porter  
Hinshaw & Culbertson LLP  
100 Park Avenue  
P. O. Box 1389  
Rockford, IL 61105-1389  
[rporter@hinshawlaw.com](mailto:rporter@hinshawlaw.com)

Scott Belt  
Belt, Dearth & Associates  
105 E. Main St., Suite 206  
Morris, IL. 60450  
[scottbelt@comcast.net](mailto:scottbelt@comcast.net)

/s Mark A. LaRose  
Mark A. LaRose

Mark A. LaRose  
ARDC No. 06183288  
LaRose & Bosco, Ltd.  
*Attorney for Respondent*  
*Community Landfill Company, Inc.*  
200 N. LaSalle Street, Suite 2810  
Chicago, IL 60601  
(312) 642-4414  
[mlarose@laroseboscowlaw.com](mailto:mlarose@laroseboscowlaw.com)