

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)
)
 Complainant,)
)
 v.)
)
 THE CITY OF MORRIS, an Illinois municipal)
 corporation, and COMMUNITY LANDFILL)
 COMPANY, INC., a dissolved Illinois)
 corporation,)
)
 Respondents.)

PCB No. PCB 11-50
(Enforcement – Land)

NOTICE OF FILING

PLEASE TAKE NOTICE that today I have filed with the Office of the Clerk of the Pollution Control Board a **NOTICE OF WITHDRAWAL OF APPEARANCE, APPEARANCE, and MOTION FOR SUBSTITUTION OF COUNSEL** for the Respondent, THE CITY OF MORRIS, a copy of which is herewith served upon you.

Dated: JANUARY 5TH 2021

Respectfully submitted,

ATTORNEY FOR RESPONDENT

/s/ 
 Christopher M. Dearth

Christopher M. Dearth
 Law Offices of Christopher M. Dearth, P.C.
 105 E. Main Street
 Suite 206
 Morris, IL 60450
 Phone: 815-941-4677

AFFIDAVIT OF SERVICE

I, the undersigned, on oath state that I served the above-referenced documents on the 5th day of January, 2021 upon the following:

Mark A. LaRose
LaRose & Bosco, Ltd.
200 N. LaSalle Street
Suite 2810
Chicago, IL 60601
mlarose@lawroseboscolaw.com

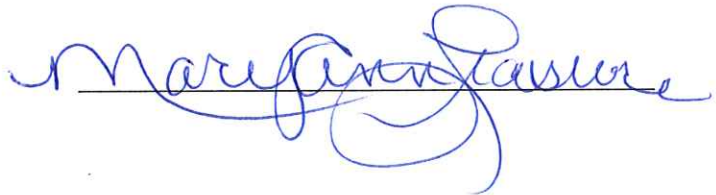
Richard S. Porter
Hinshaw & Culbertson LLP
100 Park Avenue
P.O. Box 1389
Rockford, IL 61105
rporter@hinshawlaw.com

Christopher J. Grant
Office of the Attorney General
Environmental Bureau North
69 W. Washington Street
Suite 1800
Chicago, IL 60602
CGrant@atg.state.il.us

Mayor Richard P. Kopczick
City of Morris
Morris City Hall
700 N. Division Street
Morris, IL 60450
cityhall@morrisil.org

Charles F. Helsten
Hinshaw & Culbertson
100 Park Avenue
P.O. Box 1389
Rockford, IL
chelsten@hinshawlaw.com

by emailing and depositing a copy thereof, enclosed in an envelope, U.S. Mail and at their e-mail addresses listed above



SUBSCRIBED and SWORN to,
before me this 5th day of January, 2021.

Heather A. Sohan
Notary Public



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Complainant,)

v.)

THE CITY OF MORRIS, an Illinois municipal)
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COMPANY, INC., a dissolved Illinois)
corporation,)

Respondents.)

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NOTICE OF WITHDRAWAL OF APPEARANCE


I hereby give notice of withdrawal of my appearance as representative of the Respondent,
CITY OF MORRIS, an Illinois municipal corporation, in this proceeding.

Dated: _____

1/4/21

Respectfully submitted,

/s/



Scott M. Belt

Scott M. Belt
Belt, Dearth & Associates
105 East Main Street
Suite 206
Morris, IL 60450
Phone: 815-941-4675

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MOTION FOR SUBSTITUTION OF COUNSEL

NOW COMES the Respondent, THE CITY OF MORRIS, an Illinois municipal corporation, by and through its attorney Christopher M. Dearth, of Christopher M. Dearth, P.C., and sets forth its Motion for Substitution of Counsel, and herein states as follows:

1. Scott M. Belt, a properly licensed attorney, previously filed his appearance on behalf of the Respondent, THE CITY OF MORRIS.

2. On or about December 18, 2020, Scott M. Belt was appointed to serve as an Associate Circuit Judge for the Thirteenth Circuit of Grundy County. Scott M. Belt's responsibilities will no longer include acting as an attorney on behalf of the Respondent for the case at bar, and as such, he has filed his Notice of Withdrawal pursuant to 35 Ill. Adm. Code § 101.400(b), which is also filed herewith.

3. As a result, Christopher M. Dearth, another properly licensed attorney in the State of Illinois, was assigned to the handling of this case. Christopher M. Dearth has filed herewith an Appearance pursuant to 35 Ill. Adm. Code § 101.400(a)(4), on behalf of the Respondent, THE CITY OF MORRIS.

WHEREFORE, the Respondent prays that the Hearing Officer hereby grant the Respondent's Motion for Substitution of Counsel.

Dated: JANUARY 5TH 2021

Respectfully submitted,

ATTORNEY FOR RESPONDENT

/s/ Christopher M. Dearth
Christopher M. Dearth

Christopher M. Dearth
Law Offices of Christopher M. Dearth, P.C.
105 E. Main Street
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APPEARANCE

Pursuant to 35 Ill. Adm. Code 101.400(a), (b), and (c), the undersigned, as one of its attorneys hereby enters an APPEARANCE on behalf of Respondent, THE CITY OF MORRIS, an Illinois municipal corporation. This Appearance is filed consistently and contemporaneously with the Motion of Substitution of Counsel and Notice of Withdrawal, wherein Scott M. Belt will no longer appear in a representative capacity for the Respondent and shall be hereafter substituted for the undersigned attorney.

Dated: JANUARY 5TH 2021

Respectfully submitted,

ATTORNEY FOR RESPONDENT

/s/ 
Christopher M. Dearth

Christopher M. Dearth
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