BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

In the Matter of:)
SIERRA CLUB, ENVIRONMENTAL LAW AND POLICY CENTER, PRAIRIE RIVERS NETWORK, and)))
CITIZENS AGAINST RUINING THE ENVIRONMENT,)
Complainants,) PCB 2013-015) (Enforcement – Water)
v.)
MIDWEST GENERATION, LLC,)))
Respondent.)

NOTICE OF FILING

TO: Don Brown Clerk of the Board Illinois Pollution Control Board 100 W. Randolph Street, Suite 11-500 Chicago, Illinois 60601 (VIA ELECTRONIC MAIL) Bradley P. Halloran Hearing Officer Illinois Pollution Control Board James R. Thompson Center, Suite 11-500 100 W. Randolph Street Chicago, Illinois 60601 (VIA ELECTRONIC MAIL)

(SEE PERSONS ON ATTACHED SERVICE LIST)

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Illinois Pollution Control Board **NOTICE OF WITHDRAWAL AS COUNSEL OF RECORD;** a copy of which is herewith served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL REGULATORY GROUP

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

Jennifer M. Martin Melissa S. Brown HEPLERBROOM, LLC 4340 Acer Grove Drive Springfield, Illinois 62711 Jennifer.Martin@HeplerBroom.com Melissa.Brown@HeplerBroom.com Brian.Dodds@HeplerBroom.com

Electronic Filing: Received, Clerk's Office 03/30/2021

CERTIFICATE OF SERVICE

I, Melissa S. Brown the undersigned, on oath state the following: That I have served the attached **NOTICE OF WITHDRAWAL AS COUNSEL OF**

RECORD via electronic mail upon:

Don Brown Clerk of the Board Illinois Pollution Control Board 100 W. Randolph Street, Suite 11-500 Chicago, Illinois 60601 Don.Brown@illinois.gov

Keith I. Harley Chicago, Legal Clinic, Inc. 211 West Wacker Drive, Suite 750 Chicago, IL 60606 <u>kharley@kentlaw.edu</u>

Greg Wannier Staff Attorney Sierra Club Environmental Law Program 2101 Webster Street, Suite 1300 Oakland, CA 94612 Greg.wannier@sierraclub.org

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Abel Russ Environmental Integrity Project 1000 Vermont Avenue NW Suite 1100 Washington, DC 20005 aruss@environmentalintegrity.org

That my email address is Melissa.Brown@heplerbroom.com.

That the number of pages in the email transmission is 4 pages

That the email transmission took place before 5:00 p.m. on the date of March 30, 2021.

/s/ Melissa S. Brown Melissa S. Brown

Date: March 30, 2021

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

In the Matter of:)
SIERRA CLUB, ENVIRONMENTAL)
LAW AND POLICY CENTER, PRAIRIE RIVERS NETWORK, and)
CITIZENS AGAINST RUINING THE ENVIRONMENT,)
Complainants,	 PCB 2013-015 (Enforcement – Water)
v.)
MIDWEST GENERATION, LLC,)
Respondent.)

NOTICE OF WITHDRAWAL AS COUNSEL OF RECORD

NOW COMES Brian Dodds, as counsel for the ILLINOIS ENVIRONMENTAL

REGULATORY GROUP ("IERG"), and in light of his resignation from the law firm of

HeplerBroom, LLC ("HB") and pursuant to 35 Ill. Adm. Code § 101.400(b), withdraws as

counsel of record for IERG. Please be advised that Jennifer M. Martin and Melissa S. Brown

with HB will remain counsel of record for IERG.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL REGULATORY GROUP, ILLINOIS COAL ASSOCIATION, and CHEMICAL INDUSTRY COUNCIL OF ILLINOIS

Dated: March 30, 2021

By: /s/ Brian Dodds One of Their Attorneys

Brian Dodds HEPLERBROOM, LLC 4340 Acer Grove Drive Springfield, Illinois 62711 (217) 528-3674 Brian.dodds@heplerbroom.com