Electronic Filing: Received, Clerk's Office 04/20/2023

## **BEFORE THE POLLUTION CONTROL BOARD**

PROTECT WEST CHICAGO,	
Petitioner,	
vs.	
CITY OF WEST CHICAGO, WEST CHICAGO CITY COUNCIL, and LAKESHORE RECYCLING SYSTEMS, LLC.,	
Respondents,	)

PCB 2023-107 (Third-Party Pollution Control Facility Siting Appeal)

## **NOTICE OF FILING**

TO: See attached Service List

PLEASE TAKE NOTICE that on April 20, 2023, LAKESHORE RECYCLING SYSTEMS, LLC electronically filed with the Office of the Clerk of the Illinois Pollution Control Board its Response to Petitioner's Motion to Amend, a copy of which is hereby served upon you.

Respectfully submitted,

LAKESHORE RECYCLING SYSTEMS, LLC, Respondent Karen Donnelly

One of Respondent's Attorneys

Karen Donnelly Karen Donnelly Law 501 State St. Ottawa, IL 61350 (815) 433-4775 Donnellylaw501@gmail.com

George Mueller Attorney at Law 1S123 Gardener Way Winfield, IL 60190 (630) 235-0606 george@muelleranderson.com

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### AFFIDAVIT OF SERVICE

I, the undersigned, on oath state that I have served the attached **Notice of Filing** and **Response to Petitioner's Motion to Amend** on behalf of LAKESHORE RECYCLING SYSTEMS, LLC upon the following persons to be served via email transmittal from 501 State Street, Ottawa, Illinois 61350, this 20<sup>th</sup> day of April, 2023.

Karen Donnelly

Attorney for Respondent

#### SERVICE LIST

Ricardo Meza Meza Law 542 S. Dearborn, 10<sup>th</sup> Floor Chicago, IL 60605 rmeza@meza.law

Robert A. Weinstock Director, Environmental Advocacy Center Northwestern Pritzker School of Law 375 E. Chicago Ave. Chicago, IL 60611 <u>Robert.weinstock@law.northwestern.edu</u> Bradley P. Halloran, Hearing Officer Illinois Pollution Control Board 60 E. Van Buren St., Suite 630 Chicago, IL 60605 Brad.Halloran@illinois.gov

Dennis G. Walsh Daniel Bourgault Klein, Thorpe and Jenkins, Ltd. 20 N. Wacker Dr., Suite 1660 Chicago, IL 60606 dgwalsh@ktjlaw.com dwbourgault@ktjlaw.com

# Electronic Filing: Received, Clerk's Office 04/20/2023 BEFORE THE POLLUTION CONTROL BOARD

PROTECT WEST CHICAGO,	)
Petitioner,	)
VS.	)
	)
CITY OF WEST CHICAGO, WEST	)
CHICAGO CITY COUNCIL, and	)
LAKESHORE RECYCLING SYSTEMS,	)
LLC.,	)
	)
Respondents,	)

PCB 2023-107 (Third-Party Pollution Control Facility Siting Appeal)

**RESPONSE TO PETITIONER'S MOTION TO AMEND** 

Now comes LAKESHORE RECYCLING SYSTEMS, LLC. ("LAKESHORE") by their attorneys, George Mueller and Karen Donnelly, and for its Response to Petitioner's Motion for Leave to Amend Petition for Hearing and Review of Local Siting Approval for New Pollution Control Facility filed herein on or about April 14, 2023, responds as follows:

1. Respondent, LAKESHORE RECYCLING SYSTEMS, LLC., has no objection to Petitioner's Motion for Leave to Amend Petition for Hearing and Review of Local Siting Approval for New Pollution Control Facility.

Respectfully submitted,

LAKESHORE RECYCLING SYSTEMS, LLC, Respondent

BY: /s/ George Mueller\_

George Mueller One of Respondent's Attorneys

George Mueller Attorney at Law 1S123 Gardener Way Winfield, IL 60190 (630) 235-0606 George@muelleranderson.com

Karen Donnelly Attorney at Law 501 State St. Ottawa, IL 61350 (815) 433-4775 Donnellylaw501@gmail.com