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#### BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

JUL 9 2003

2222 ELSTON LLC, an Illinois limited liability company,	) STATE OF ILLINOIS ) Pollution Control Board
Complainant,	
<b>v.</b>	) PCB No. 03-55
PUREX INDUSTRIES, INC., a Delaware corporation, FEDERAL DIE CASTING CO., an Illinois corporation, FEDERAL CHICAGO CORP., an Illinois corporation, RAYMOND E. CROSS, an Illinois resident, BEVERLY BANK TRUST NO. 8-7611, and LAKESIDE BANK TRUSTS NOS. 10-1087 AND 10-1343	, ) ) ) ) ) )
Respondents.	) -

# NOTICE OF FILING OF MOTION FOR WITHDRAWAL OF CARRIE L. TAUBMAN AND FILING OF APPEARANCE AND SUBSTITUTION OF SHORGE K. SATO

PLEASE TAKE NOTICE that on July 9, 2003, the undersigned caused to be filed with the Illinois Pollution Control Board, 100 West Randolph Street, James R. Thompson Center, Suite 11-500, Chicago, Illinois 60601-3218, the withdrawal of attorney Carrie L. Taubman on behalf of Federal Die Casting Co., Federal Chicago Corp., Raymond E. Cross, Beverly Bank Trust No. 8-7611 and Lakeside Bank Trust Nos. 10-1087 and 10-1343, a copy of which is attached and hereby served upon you. Shorge K. Sato, duly licensed to practice law in the State of Illinois, has filed an appearance and substitution for Carrie L. Taubman in the representation of Federal Die Casting Co., Federal Chicago Corp., Raymond E. Cross, Beverly Bank Trust No. 8-7611 and Lakeside Bank Trust Nos. 10-1087 and 10-1343.

Carrie L. Taubman LATHAM & WATKINS LLP 233 South Wacker Drive, Suite 5800 Chicago, Illinois 60606 Telephone: (312) 876-7700 Facsimile: (312) 993-9767

Attorney for Federal Die Casting Co., Federal Chicago Corp., Raymond E. Cross, Beverly Bank Trust No. 8-7611 and Lakeside Bank Trust Nos. 10-1087 and 10-1343

## BEFORE THE ILLINOIS POLLUTION CONTROL BOARDECEIVED CLERK'S OFFICE 2222 ELSTON LLC, an Illinois 9 2003 JUL limited liability company, STATE OF ILLINOIS Pollution Control Board Complainant, PCB No. 03-55 v. PUREX INDUSTRIES, INC., a Delaware corporation, FEDERAL DIE CASTING CO., an Illinois corporation, FEDERAL CHICAGO CORP., an Illinois corporation, RAYMOND E. CROSS, an Illinois resident,) BEVERLY BANK TRUST NO. 8-7611, and LAKESIDE BANK TRUSTS NOS. 10-1087 AND 10-1343 Respondents.

### <u>MOTION FOR WITHDRAWAL OF CARRIE L. TAUBMAN</u>

PURSUANT TO Section 101.400 of Title 35 of the Illinois Administrative Code, Carrie L. Taubman, having previously appeared in a representative capacity before the Illinois Pollution Control Board on behalf of Federal Die Casting Co., Federal Chicago Corp., Raymond E. Cross, Beverly Bank Trust No. 8-7611 and Lakeside Bank Trust Nos. 10-1087 and 10-1343, hereby moves the Board for leave to withdraw from that representation.

Carrie L. Taubman LATHAM & WATKINS LLP
233 South Wacker Drive, Suite 5800
Chicago, Illinois 60606
Telephone: (312) 876-7700

Facsimile: (312) 993-9767

Attorney for Federal Die Casting Co., Federal Chicago Corp., Raymond E. Cross, Beverly Bank Trust No. 8-7611 and Lakeside Bank Trust Nos. 10-1087 and 10-1343

BEFORE THE ILLINOIS	CLERK'S OFFICE
2222 ELSTON LLC, an Illinois	) JUL 9 2003
limited liability company,	STATE OF ILLINOIS
Complainant,	) Pollution Control Board
v.	) PCB No. 03-55
PUREX INDUSTRIES, INC., a Delaware corporation, FEDERAL DIE CASTING CO., an Illinois corporation, FEDERAL CHICAGO CORP., an Illinois corporation, RAYMOND E. CROSS, an Illinois resident, BEVERLY BANK TRUST NO. 8-7611, and LAKESIDE BANK TRUSTS NOS. 10-1087 AND 10-1343	
Respondents	,

### APPEARANCE AND SUBSTITUTION OF SHORGE K. SATO

PURSUANT TO Section 101.400 of Title 35 of the Illinois Administrative Code, Shorge K. Sato hereby files his appearance as attorney on behalf of Federal Die Casting Co., Federal Chicago Corp., Raymond E. Cross, Beverly Bank Trust No. 8-7611 and Lakeside Bank Trust Nos. 10-1087 and 10-1343. Mr. Sato will substitute for Ms. Taubman as attorney of record.

Shorge K. Sato ARDC No. 6278382

LATHAM & WATKINS LLP 233 South Wacker Drive, Suite 5800

Chicago, Illinois 60606 Telephone: (312) 876-7700

Facsimile: (312) 993-9767

### **CERTIFICATE OF SERVICE**

It is hereby certified that true copies of the foregoing NOTICE OF FILING OF MOTION FOR WITHDRAWAL AND FILING OF APPEARANCE AND SUBSTITUTION, MOTION FOR WITHDRAWAL OF CARRIE L. TAUBMAN, AND APPEARANCE AND SUBSTITUTION OF SHORGE K. SATO, were mailed, first class, to each of the following on July 9, 2003:

Francis A. Citera, Esq.
Daniel T. Fahner, Esq.
Greenberg Traurig, P.C.
77 West Wacker Drive
Suite 2500
Chicago, Illinois 60601
Attorneys for Complainant 2222 Elston LLC

Robert L. Graham
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One IBM Plaza
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Attorneys for Respondent Purex Industries, Inc.

Craig V. Richardson, Esq.
Christopher J. Neumann, Esq.
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1200 Seventeenth Street
Twenty-Fourth Floor
Denver, Colorado 80202
Attorneys for Complainant 2222 Elston LLC

Charles King Assistant Corporation Counsel City of Chicago 30 N. LaSalle Street 25<sup>th</sup> Floor Chicago, Illinois 60602-2575

It is hereby certified that a true copy of the foregoing were hand delivered upon the following on July 9, 2003:

Dorothy M. Gunn Illinois Pollution Control Board James R. Thompson Center 100 W. Randolph St., Ste. 11-500 Chicago, Illinois 60601 Bradley P. Halloran
Hearing Officer
Illinois Pollution Control Board
100 W. Randolph Street, Suite 11-500
Chicago, Illinois 60601

Carrie L. Taubman