

RECEIVED
CLERK'S OFFICE

DEC 11 2003

STATE OF ILLINOIS
Pollution Control Board

BEFORE THE
ILLINOIS POLLUTION CONTROL BOARD

REPUBLIC BANK OF CHICAGO, as)
Trustee of Trust #2234, ARISTOTLE)
HALIKIAS, LENA HALIKIAS, MICHAEL)
HALIKIAS, NIKOLAS HALIKIAS,)
NOULA HALIKIAS, and PATRICIA)
HALIKIAS, as beneficiaries of Trust #2234,)

PCB-04-69
(Citizen's Suit UST Enforcement)

Complainants,)

v.)

SUNOCO, INC. (R&M),)

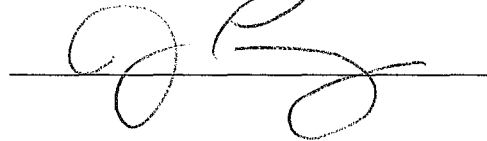
Respondent.)

MOTION TO APPEAR PRO HAC VICE

Joseph Freudenberg moves this Board pursuant to 35 Ill. Adm. Code 101.400(a)(3) to allow said movant to appear *pro hac vice* in the above entitled matter on behalf of Sunoco, Inc. (R&M), and in support thereof states and certifies to the Board:

1. That movant is an attorney licensed to practice law in the Commonwealth of Pennsylvania.
2. That movant is a member in good standing in the Bar set forth above.
3. That movant does not wish to be admitted generally, but for the purpose of this case only.

THEREFORE, movant respectfully requests permission to appear of record and participate *pro hac vice* before the Illinois Pollution Control Board.



Joseph Freudenberg, Esq.
Sunoco, Inc.
10 Penn Center – 17th Floor
1801 Market Street
Philadelphia, PA 19103
(215) 977-6789

RECEIVED
CLERK'S OFFICE

DEC 11 2003

STATE OF ILLINOIS
Pollution Control Board

BEFORE THE
ILLINOIS POLLUTION CONTROL BOARD


REPUBLIC BANK OF CHICAGO, as)
Trustee of Trust #2234, ARISTOTLE)
HALIKIAS, LENA HALIKIAS, MICHAEL)
HALIKIAS, NIKOLAS HALIKIAS,)
NOULA HALIKIAS, and PATRICIA)
HALIKIAS, as beneficiaries of Trust #2234,))
Complainants,)
)
)
v.)
)
SUNOCO, INC. (R&M),)
)
Respondent.)

PCB-04-69
(Citizen's Suit UST Enforcement)

APPEARANCE

Joseph Freudenberg of Sunoco, Inc. hereby enters his appearance as counsel for Sunoco, Inc. (R&M). Joseph Freudenberg is designated as the lead attorney for purposes of mail and phone contact pertaining to this proceeding.

SUNOCO, INC. (R&M)

By: 
One of Their Attorneys

Joseph Freudenberg, Esq.
Sunoco, Inc.
10 Penn Center – 17th Floor
1801 Market Street
Philadelphia, PA 19103
(215) 977-6789

RECEIVED
CLERK'S OFFICE

DEC 11 2003

BEFORE THE
ILLINOIS POLLUTION CONTROL BOARD

STATE OF ILLINOIS
Pollution Control Board

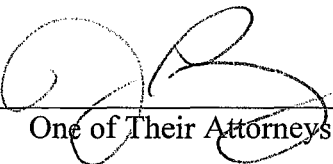
REPUBLIC BANK OF CHICAGO, as)
Trustee of Trust #2234, ARISTOTLE)
HALIKIAS, LENA HALIKIAS, MICHAEL)
HALIKIAS, NIKOLAS HALIKIAS,)
NOULA HALIKIAS, and PATRICIA)
HALIKIAS, as beneficiaries of Trust #2234,))
)
Complainants,)
)
)
v.)
)
SUNOCO, INC. (R&M),)
)
Respondent.)

PCB-04-69
(Citizen's Suit UST Enforcement)

RESPONDENT SUNOCO, INC. (R&M)'S UNOPPOSED MOTION FOR EXTENSION
OF TIME TO ANSWER COMPLAINT

Respondent Sunoco, Inc. (R&M) hereby moves for an extension of time to answer the Complaint until February 13, 2004. The parties seek to explore the potential for settlement prior to answering the Complaint. Counsel for Complainants has authorized the representation that Complainants do not oppose the grant of this motion.

SUNOCO, INC. (R&M)

By:  _____
One of Their Attorneys

Joseph Freudenberg, Esq.
Sunoco, Inc.
10 Penn Center - 17th Floor
Philadelphia, PA 19103
(215) 977.6789

BEFORE THE
ILLINOIS POLLUTION CONTROL BOARD

RECEIVED
CLERK'S OFFICE

DEC 11 2003

STATE OF ILLINOIS
Pollution Control Board

REPUBLIC BANK OF CHICAGO, as)
Trustee of Trust #2234, ARISTOTLE)
HALIKIAS, LENA HALIKIAS, MICHAEL)
HALIKIAS, NIKOLAS HALIKIAS,)
NOULA HALIKIAS, and PATRICIA)
HALIKIAS, as beneficiaries of Trust #2234,)

PCB-04-69
(Citizen's Suit UST Enforcement)

Complainants,)
)
)
)

v.)
)
)

SUNOCO, INC. (R&M),)
)
)

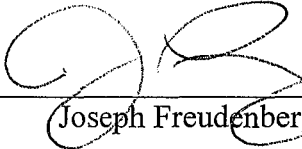
Respondent.)

CERTIFICATE OF SERVICE

I, the undersigned, certify that I have served the attached (i) Appearance, (ii) Motion to Appear *Pro Hac Vice*, and (iii) Unopposed Motion for Extension of Time to Answer Complaint, by U.S. Mail, upon the following person:

For Complainants:

Andrew H. Perellis
Seyfarth Shaw LLC
55 East Monroe Street
Suite 4200
Chicago, IL 60603



Joseph Freudenberg