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DEC 30 2003

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

STATE OF ILLINOIS  
Pollution Control Board

PEOPLE OF THE STATE OF ILLINOIS, *ex* )  
*rel.* LISA MADIGAN, Attorney General of )  
the State of Illinois, )

Complainant, )

vs. )

KEYSTONE CONSOLIDATED )  
INDUSTRIES, INC. d/b/a KEYSTONE )  
STEEL & WIRE COMPANY, )

Respondent. )

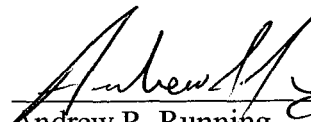
PCB No. 00-142  
(Enforcement-Water, RCRA)

**NOTICE OF FILING**

TO: Attached Service List

PLEASE TAKE NOTICE that today we filed an Agreed Motion For Continuance, copies of which are attached and herewith served upon you.

Respectfully submitted,



Andrew R. Running  
KIRKLAND & ELLIS LLP  
200 East Randolph Drive  
Chicago, IL 60601  
(312) 861-2000

Attorneys for KEYSTONE  
CONSOLIDATED INDUSTRIES, INC.

DATED: December 30, 2003

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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD DEC 30 2003

PEOPLE OF THE STATE OF ILLINOIS, )  
ex rel. LISA MADIGAN, Attorney )  
General of the State of Illinois, )  
 )  
Complainant, )  
 )  
vs. )  
 )  
KEYSTONE CONSOLIDATED INDUSTRIES, )  
INC. d/b/a KEYSTONE STEEL & WIRE )  
COMPANY, )  
 )  
Respondent. )

STATE OF ILLINOIS  
Pollution Control Board

PCB No. 00-142  
(Enforcement-Water, RCRA)

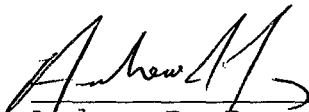
AGREED MOTION FOR CONTINUANCE

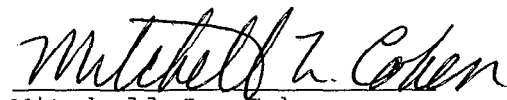
TO: Bradley P. Halloran  
Hearing Officer  
Illinois Pollution Control Board  
James R. Thompson Center  
100 W. Randolph, Suite 11-500  
Chicago, Illinois 60601

COMES NOW, Complainant's attorney, Mitchell L. Cohen, and Respondent's attorney, Andrew R. Running, and respectfully requests this matter be continued 60 days to March 9, 2004, at 10:00 a.m., or such other date and time that fits the Hearing Officer's docket.

In support of this Agreed Motion for Continuance, both attorneys represent that the Consent Order prepared in a related case is awaiting signature; the filing of that Consent Order will help resolve this enforcement action; and both attorneys will be out of town involved in trials on January 6, 2004, when this matter is next set for status.

Respectfully Submitted,

  
\_\_\_\_\_  
Andrew R. Running  
Kirkland And Ellis  
200 E. Randolph  
Chicago, Illinois 60601

  
\_\_\_\_\_  
Mitchell L. Cohen  
Assistant Attorney General  
Environmental Bureau  
188 West Randolph, Suite 2001  
Chicago, IL 60601

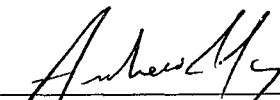
**CERTIFICATE OF SERVICE**

I hereby certify that true copies of the foregoing Agreed Motion For Continuance were served as follows to each of the individuals listed below on December 30, 2003:

Dorothy Gunn, Clerk  
Illinois Pollution Control Board  
James R. Thompson Center  
100 W. Randolph Street  
Suite 11-500  
Chicago, IL 60601  
(by hand-delivery)

Bradley P. Halloran  
Hearing Officer  
Illinois Pollution Control Board  
James R. Thompson Center  
100 W. Randolph Street  
Suite 11-500  
Chicago, IL 60601  
(by hand-delivery)

Mitchell L. Cohen  
Assistant Attorney General  
Office of the Attorney General  
Environmental Bureau  
188 W. Randolph Street  
Suite 2001  
Chicago, IL 60601  
(by first-class mail)

  
\_\_\_\_\_  
Andrew R. Running  
KIRKLAND & ELLIS LLP  
200 East Randolph Drive  
Suite 6100  
Chicago, IL 60601  
(312) 861-2000

Attorney for KEYSTONE  
CONSOLIDATED INDUSTRIES, INC.