

BEFORE THE ILLINOIS
POLLUTION CONTROL BOARD

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FEB 16 2006

STATE OF ILLINOIS
Pollution Control Board

GRAND PIER CENTER LLC and
AMERICAN INTERNATIONAL
SPECIALTY LINES INSURANCE CO.
as subrogee of Grand Pier Center, LLC

Complainants

v.

RIVER EAST LLC
CHICAGO DOCK AND CANAL TRUST
CHICAGO DOCK AND CANAL COMPANY
KERR-MCGEE CHEMICAL LLC

Respondents

PCB 05 - 157
(Enforcement)

NOTICE OF FILING

Frederick S. Mueller
Daniel C. Murray
Garrett L. Boehm, Jr.
Johnson & Bell, Ltd.
33 West Monroe Street
Suite 2700
Chicago, Illinois 60603

Michael P. Connelly
Garret C. Carter
Connelly Roberts & McGivney
LLC
One North Franklin Street,
Suite 1200
Chicago, IL 60606

Bradley Halloran
Hearing Officer
Illinois Pollution Control Board
James R. Thompson Center
Suite 11-500
Chicago, Illinois 60601

PLEASE TAKE NOTICE that on February 16, 2006, we caused to be filed with the Illinois Pollution Control Board in the James R. Thompson Center, Chicago, Illinois, **MOTION FOR WITHDRAWAL (OF REPRESENTATION)**, a copy of which is attached and hereby served upon you.

Respectfully submitted,

RIVER EAST L.L.C. AND CHICAGO
DOCK AND CANAL TRUST

By:


One of Their Attorneys

Donald J. Moran
Abad Lopez
Pedersen & Houpt
161 North Clark Street, Suite 3100
Chicago, IL 60601
Telephone: (312) 641-6888

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AMERICAN INTERNATIONAL)
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RIVER EAST LLC)
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CHICAGO DOCK AND CANAL COMPANY)
KERR-MCGEE CHEMICAL LLC)

Respondents)

MOTION FOR WITHDRAWAL (OF REPRESENTATION)

NOW COMES, PEDERSEN & HOUPPT, as attorneys of record for RIVER EAST L.L.C., CHICAGO DOCK and CANAL TRUST (collectively "River East"), and hereby Move to Withdraw as Attorneys of Record for River East in the above captioned case, and in support thereof state as follows:

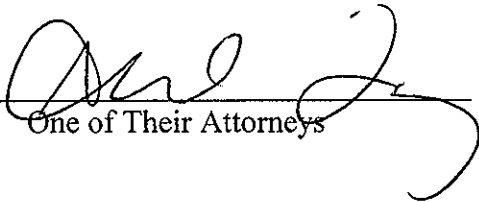
1. Pedersen & Houpt is currently counsel of record for River East in the above captioned case.
2. Over the past few months, River East has been unable to pay the amounts due to Pedersen & Houpt for their representation in the above captioned case and upon information and belief will be unable to make any future payments. Despite efforts to resolve these issues, the unpaid amounts prevent Pedersen & Houpt from being able to carry out its duties as counsel.
3. Pedersen & Houpt requests that this Honorable Court grant it leave to withdraw its

Appearance of Record on behalf of River East.

Dated: February 16, 2006

Respectfully submitted,

RIVER EAST L.L.C. AND CHICAGO
DOCK AND CANAL TRUST

By: 
One of Their Attorneys

Donald J. Moran
Abad Lopez
Pedersen & Houpt
161 North Clark Street
Suite 3100
Chicago, IL 60601
Telephone: (312) 641-6888

CERTIFICATE OF SERVICE

I, Abad Lopez, an attorney, on oath certify that I caused to be served the foregoing **Motion for Withdrawal (of Representation)**, upon the following counsel of record:

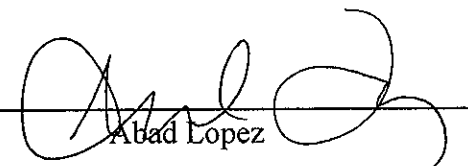
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Chicago, Illinois 60601

by U.S. mail delivery by depositing said document into the United States mail at 161 North Clark Street, Chicago, Illinois, proper postage paid, at or before 5:00 p.m. this 16th day of February 2006.

By: _____


Abad Lopez