

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

IN THE MATTER OF: )  
 )  
PROPOSED NEW 35 ILL.ADM.CODE PART 225 ) PCB R06-25  
CONTROL OF EMISSIONS FROM ) Rulemaking - Air  
LARGE COMBUSTION SOURCES )

**NOTICE OF FILING**

To:

Dorothy Gunn, Clerk  
Illinois Pollution Control Board  
James R. Thompson Center  
Suite 11-500  
100 West Randolph  
Chicago, Illinois 60601

Marie Tipsord  
Hearing Office  
Illinois Pollution Control Board  
James R. Thompson Center  
100 W. Randolph  
Suite 11-500  
Chicago, Illinois 60601

Gina Roccaforte, Assistant Counsel  
Charles Matoesian, Assistant Counsel  
John J. Kim, Managing Attorney, Air  
Regulatory Unit  
Division of Legal Counsel  
Illinois Environmental Protection Agency  
1021 North Grand Avenue, East  
P.O. Box 19276  
Springfield, Illinois 62794-9276

Persons included on the  
**ATTACHED SERVICE LIST**

PLEASE TAKE NOTICE that we have today filed with the Office of the Clerk of the Pollution Control Board MOTION FOR *PRO HAC VICE* ADMISSION OF JAMES W. INGRAM and APPEARANCE OF JAMES W. INGRAM, copies of which are herewith served upon you.

/s/ **Kathleen C. Bassi**

Kathleen C. Bassi

Dated: April 13, 2006

SCHIFF HARDIN LLP

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**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

IN THE MATTER OF: )  
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PROPOSED NEW 35 ILL.ADM.CODE PART 225 ) PCB R06-25  
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**MOTION FOR *PRO HAC VICE* ADMISSION OF JAMES W. INGRAM**

Pursuant to 35 Ill.Adm.Code § 101.400(a)(3), I, James W. Ingram, hereby request that the Illinois Pollution Control Board permit my appearance *pro hac vice* in this matter on behalf of Dynegy Midwest Generation, Inc. In support of this motion, I state as follows:

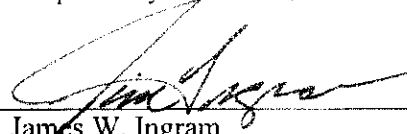
1. I am Senior Corporate Counsel at Dynegy Midwest Generation, Inc., 1000 Louisiana Street, Suite 5800, Houston, Texas 77002.
2. I am a member in good standing of the Bar of the State of Texas and have been admitted to practice in the following state and federal bars:
  - a. State Bar of Texas (ID No. 10400150) – November 1982
  - b. U. S. District Court for the Northern District of Texas – 1982
  - c. U. S. Court of Appeals for the Fifth Circuit – 1985
  - d. U. S. District Court for the Southern District of Texas – 1988
  - e. U. S. District Court for the Eastern District of Texas – 1992
  - f. U. S. District Court for the Western district of Texas – 1993
  - g. U. S. Patent and Trademark Office - 2000
3. No disciplinary proceedings are pending or have ever been brought against me, and I have never been disbarred or subject to disbarment proceedings.

4. I am familiar with the provisions of the Illinois Code of Civil Procedure and the Illinois Supreme Court Rules, and I understand and agree to be bound by them in all proceedings before the Illinois Pollution Control Board.

5. I have represented Dynegy Midwest Generation, Inc. on environmental matters for five (5) years, and Dynegy Midwest Generation, Inc. wishes that I represent it in this matter.

WHEREFORE, I respectfully request that the Illinois Pollution Control Board admit me *pro hac vice* in this matter on behalf of Dynegy Midwest Generation, Inc.

Respectfully submitted,



James W. Ingram  
Senior Corporate Counsel  
Dynegy Midwest Generation, Inc.  
1000 Louisiana Street, Suite 5800  
Houston, Texas 77002  
713-767-0450

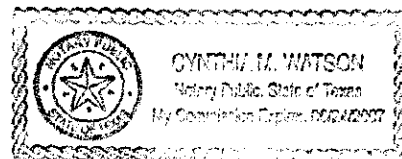
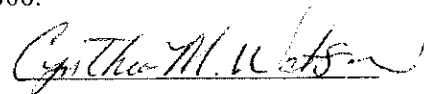
Dated: March 17, 2006

STATE OF TEXAS            )  
  ) SS:  
COUNTY OF HARRIS        )

Before me, the undersigned, a Notary Public in and for said County and State, personally appeared James W. Ingram, who acknowledged the execution of the foregoing instrument for and on behalf of said entity.

Witness my hand and Notarial Seal this 17 day of March 2006.

My Commission Expires: 06/24/07



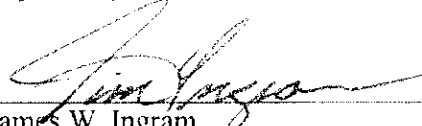
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**APPEARANCE**

I hereby file my appearance in this proceeding, on behalf of Dynegy Midwest Generation, Inc.

Respectfully submitted,



---

James W. Ingram  
Senior Corporate Counsel  
Dynegy Midwest Generation, Inc.  
1000 Louisiana Street, Suite 5800  
Houston, Texas 77002  
713-767-0450

---

Dated: March 17, 2006

**CERTIFICATE OF SERVICE**

I, the undersigned, certify that on this 13<sup>th</sup> day of April, 2006, I have served electronically the attached MOTION FOR *PRO HAC VICE* ADMISSION OF JAMES W. INGRAM and APPEARANCE OF JAMES W. INGRAM, upon the following persons:

Dorothy Gunn, Clerk  
Illinois Pollution Control Board  
James R. Thompson Center  
Suite 11-500  
100 West Randolph  
Chicago, Illinois 60601

and by first-class mail with postage thereon fully prepaid and affixed to the following persons:

Marie Tipsord  
Hearing Office  
Illinois Pollution Control Board  
James R. Thompson Center  
100 W. Randolph  
Suite 11-500  
Chicago, Illinois 60601

Gina Roccaforte, Assistant Counsel  
Charles Matoesian, Assistant Counsel  
John J. Kim, Managing Attorney  
Air Regulatory Unit  
Division of Legal Counsel  
Illinois Environmental Protection Agency  
1021 North Grand Avenue, East  
P.O. Box 19276  
Springfield, Illinois 62794-9276

to the participants listed on the  
**ATTACHED SERVICE LIST**

**/s/ Kathleen C. Bassi**

Kathleen C. Bassi

SCHIFF HARDIN LLP  
Attorneys for Dynegy Midwest Generation, Inc, Midwest Generation, LLC, and  
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