

**BEFORE THE ILLINOIS
POLLUTION CONTROL BOARD**

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MAY 11 2006

STATE OF ILLINOIS
Pollution Control Board

GRAND PIER CENTER LLC)
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)

TO: Frederick S. Mueller
Daniel C. Murray
Garrett L. Boehm, Jr.
JOHNSON & BELL, LTD.
33 West Monroe Street
Suite 2700
Chicago, IL 60603-5404

Donald J. Moran
Pedersen & Houpt
161 North Clark Street
Suite 3100
Chicago, IL 60601-3242

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

NOTICE OF FILING

PLEASE TAKE NOTICE that on May 11, 2006, we caused to be filed with the Illinois Pollution Control Board in the James R. Thompson Center, Chicago, Illinois, **TRONOX LLC'S MOTION TO WITHDRAW ATTORNEY'S APPEARANCE**, a copy of which is served upon you along with this notice.

Tronox LLC

By: _____

One of its attorneys

Michael P. Connelly
Garrett C. Carter
Connelly Roberts & McGivney LLC
One North Franklin Street
Suite 1200
Chicago, Illinois 60606
Tele: (312) 251.9600

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STATE OF ILLINOIS
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**BEFORE THE ILLINOIS
POLLUTION CONTROL BOARD**

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

Complainants/)
Counter-Complaint Respondents,)

v.)

PCB 2005-157
(Enforcement)

RIVER EAST LLC,)
CHICAGO DOCK AND CANAL TRUST,)
CHICAGO DOCK AND CANAL COMPANY,)

Respondents,)

TRONOX LLC,)

Respondent/)
Counter-Complaint Complainant.)

MOTION TO WITHDRAW ATTORNEY'S APPEARANCE

Tronox, LLC, by its attorneys, Connelly Roberts & McGivney LLC and Covington & Burling, pursuant to Illinois Supreme Court Rule 13(c), hereby requests the Illinois Pollution Control Board allow it to withdraw the appearance of J.T. Smith and in support states:

1. On or about July 7, 2005, J.T. Smith and Thomas E. Hogan, attorneys at the law firm of Covington & Burling, filed a motion requesting an order allowing them to appear *pro hac vice* as additional counsel for Tronox, LLC.
2. On August 18, 2005, the Illinois Pollution Control Board entered an order granting their motion to be admitted *pro hac vice*.
3. J.T. Smith has since retired from Covington & Burling.

4. Pursuant to Illinois Supreme Court Rule 13(c), Tronox requests that J.T. Smith be granted leave to withdraw his appearance on behalf of Tronox, LLC.

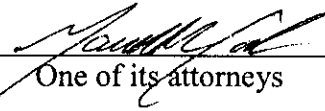
5. All orders and notices provided to Covington & Burling should be addressed to Thomas E. Hogan.

WHEREFORE, Tronox, LLC respectfully requests that the Illinois Pollution Control Board enter an Order allowing J.T. Smith to withdraw his appearance on behalf of Tronox, LLC.

Dated: May 11, 2006

Respectfully submitted,

Tronox, LLC

By: 
One of its attorneys

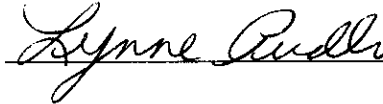
Michael P. Connelly
Garrett Carter
Connelly Roberts & McGivney LLC
One North Franklin Street
Suite 1200
Chicago, Illinois 60606

Thomas E. Hogan
COVINGTON & BURLING
1201 Pennsylvania Avenue, N.W.
Washington, D.C. 20004-2401
(202) 662-6000

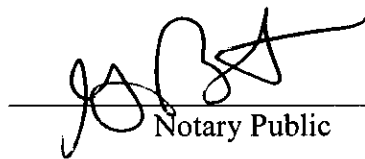
Attorneys for Tronox LLC

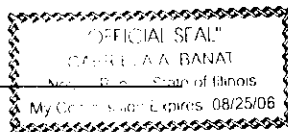
CERTIFICATE OF SERVICE

I, Lynne Pudlo, a non-attorney, being first sworn on oath, depose and state that I served the attached **TRONOX LLC'S MOTION TO WITHDRAW ATTORNEY'S APPEARANCE** on the attorneys of record by mailing true and correct copies in a properly addressed, sealed envelope with appropriate postage affixed and depositing same in the U.S. mail located at One North Franklin Street, Chicago, Illinois, before 5:00 p.m. on May 11, 2006.

_____

Subscribed and sworn to
before me May 11, 2006.

_____
Notary Public



BEFORE THE ILLINOIS
POLLUTION CONTROL BOARD

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GRAND PIER CENTER LLC
AMERICAN INTERNATIONAL
SPECIALTY LINES INSURANCE CO.
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Complainants,

v.

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CHICAGO DOCK AND CANAL COMPANY
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Respondents.

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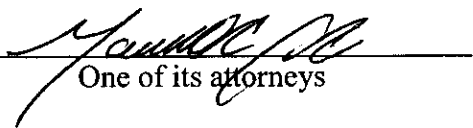
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Suite 3100
Chicago, IL 60601-3242

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

NOTICE OF FILING

PLEASE TAKE NOTICE that on May 11, 2006, we caused to be filed with the Illinois Pollution Control Board in the James R. Thompson Center, Chicago, Illinois, **TRONOX LLC'S MOTION TO WITHDRAW MOTION FOR SUMMARY JUDGMENT DIRECTED TOWARDS THE HEARING OFFICER**, a copy of which is served upon you along with this notice.

Tronox LLC

By: 
One of its attorneys

Michael P. Connelly
Garrett C. Carter
Connelly Roberts & McGivney LLC
One North Franklin Street
Suite 1200
Chicago, Illinois 60606
Tele: (312) 251.9600

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CHICAGO DOCK AND CANAL COMPANY,)

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TRONOX LLC,)

Respondent/)
Counter-Complaint Complainant.)

**TRONOX LLC'S MOTION TO WITHDRAW MOTION FOR SUMMARY
JUDGMENT DIRECTED TOWARDS THE HEARING OFFICER**

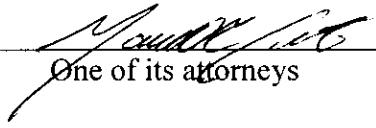
Tronox, LLC, by its attorneys, Connelly Roberts & McGivney LLC and Covington & Burling, hereby moves to withdraw its Motion for Summary Judgment with respect to all claims asserted by Plaintiffs/Counterclaim Defendants Grand Pier Center LLC ("Grand Pier") and American International Specialty Lines Insurance Co. ("American International"), as subrogee of Grand Pier (collectively, the "plaintiffs"). Tronox reserves the right to file a subsequent motion for summary judgment.

WHEREFORE, Tronox LLC respectfully requests the Hearing Officer withdraw Tronox, LLC's Motion for Summary Judgment.

Dated: May 11, 2006

Respectfully submitted,

Tronox, LLC

By: 
One of its attorneys

Michael P. Connelly
Garrett Carter
Connelly Roberts & McGivney LLC
One North Franklin Street
Suite 1200
Chicago, Illinois 60606
(312) 782-0690

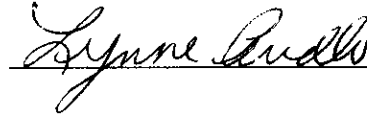
Thomas E. Hogan
COVINGTON & BURLING
1201 Pennsylvania Avenue, N.W.
Washington, D.C. 20004-2401
(202) 662-6000

Attorneys for Tronox LLC

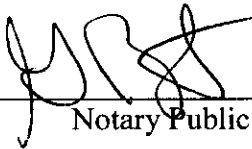
2470040/motion to withdraw sj

CERTIFICATE OF SERVICE

I, Lynne Pudlo, a non-attorney, being first sworn on oath, depose and state that I served the attached **TRONOX LLC'S MOTION TO WITHDRAW MOTION FOR SUMMARY JUDGMENT DIRECTED TOWARDS THE HEARING OFFICER** on the attorneys of record by mailing true and correct copies in a properly addressed, sealed envelope with appropriate postage affixed and depositing same in the U.S. mail located at One North Franklin Street, Chicago, Illinois, before 5:00 p.m. on May 11, 2006.



Subscribed and sworn to
before me May 11, 2006.



Notary Public

