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September 12, 2007

Mr. John L. Therriault, Assistant Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph 11-500
Chicago, Illinois 60601

RECEIVED
CLERK'S OFFICE
SEP 14 2007
STATE OF ILLINOIS
Pollution Control Board

**RE: Loretta Thigpen v. Morton Mobile Home Park LLC
PCB 08-12 (Citizens Enforcement – PWS)
Our File No. 6182.0
Proof of Service of Complaint by Certified Mail**

Dear Mr. Therriault:

Pursuant to Sections 101.304(b) and (d) of the Procedural Rules of the Illinois Pollution Control Board, 35 Ill. Admin. Code 101.304(b) and (d), we hereby enclose the following documents with the Board as proof of service of the Notice and Citizen's Complaint on the Respondent in the above matter:

1. USPS Certified Mail receipt for parcel number 7006 0100 0000 6012 9873 indicating that said items were mailed by certified mail return receipt requested on July 30, 2007;
2. USPS Track & Confirm establishing that said parcel was delivered at 9:00 am on August 3, 2007;
3. Email communication dated Tuesday, September 11, 2007 with counsel for Respondent confirming service.

As is referenced in the emails, the green return receipt card was apparently lost.

Thank you for your consideration.

Very truly yours,

**HASSELBERG, WILLIAMS, GREBE,
SNODGRASS & BIRDSALL**


David L. Wentworth II

DLW/smh

Enc.

Cc: William J. Anaya, Arnstein & Lehr, LLP, 120 S. Riverside Plaza, Suite 1200, Chicago IL 60606 (with enclosures)
W:\DLW\Land Use-Zoning\Thigpen\Asst Clerk.ltr.doc



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Track & Confirm

FAQs

Track & Confirm

Search Results

Label/Receipt Number: 7006 0100 0000 6012 9873
Status: **Delivered**

Your item was delivered at 9:00 AM on August 3, 2007 in CHICAGO, IL 60606.

[Additional Details >](#)

[Return to USPS.com Home >](#)

[Go >](#)

Track & Confirm

Enter Label/Receipt Number.

Notification Options

Track & Confirm by email

Get current event information or updates for your item sent to you or others by email.

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CERTIFIED MAIL™ RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)
For delivery information visit our website at www.usps.com

OFFICIAL USE

Postage	\$	7-30-07 Postmark Here
Certified Fee	/	
Return Receipt Fee (Endorsement Required)	/	
Restricted Delivery Fee (Endorsement Required)	/	
Total Postage & Fees	\$6.28	6189.0 5950.0 ERV

Sent To: Morton mobile Home Park, LLC
 Registered Agent
 Thomas P. Conley
 150 S. Riverside Plaza, #1200
 Chicago, IL 60606

PS Form 3800, June 2002 See Reverse for Instructions

David L. Wentworth II

From: David L. Wentworth II
Sent: Tuesday, September 11, 2007 5:10 PM
To: William J. Anaya (wjanaya@arnstein.com)
Cc: 'tpconley@arnstein.com'
Subject: FW: Thigpen v. Morton Mobile Home Park, LLC; PCB Case No. 2008-012

Dear Bill: Thank you for your call indicating that service of the Complaint in the above matter was indeed achieved. We will file the appropriate certificate of service indicating service was made on August 3, 2007 pursuant to the USPS proof of delivery from the USPS website (as the green card has apparently been lost). I informed you of the September 6 Order of the Board indicating we had to file a certificate of service by October 9. In reading the notice attached to the complaint, and reviewing board rules, it appears Morton Mobile Home Park, LLC would have only 30 days to file an objection on frivolous or duplicative grounds, and that that date has past. Subject to Board approval or leave, I have no objection if you want to file such an objection within 14 days, or by September 25. Since we only confirmed actual service today based on my email of yesterday (below), it makes sense to allow some time should your client want to file such an objection. I will include a copy of this email in my certificate of service filed with the Board. Thanks for your consideration.
Dave

David L. Wentworth II
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124 S.W. Adams Street, Suite 360
Peoria, Illinois 61602-1320
309-637-1400 (After hours: Ext. 207)
309-637-1500 Fax
dwentworth@hwgsb.com

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-----Original Message-----

From: David L. Wentworth II
Sent: Monday, September 10, 2007 2:38 PM
To: 'tpconley@arnstein.com'
Cc: Susan M. Hudson
Subject: Thigpen v. Morton Mobile Home Park, LLC; PCB Case No. 2008-012

Dear Mr. Conley: Please be advised that I represent Loretta Thigpen, a resident of the Morton Mobile Home Park, LLC, an Illinois limited liability company, d/b/a Edgewood Terrace Mobile Home Park, regarding her citizen complaint filed with the Illinois Pollution Control Board, for which a link to the case page at the IPCB website follows: <http://www.ipcb.state.il.us/COOL/external/CaseView2.asp?referer=Weekly&case=13326#>. In an attempt to serve the complaint, on July 30th, we sent it to you as registered agent for the entity via certified mail, return receipt requested. To date, we have neither received the green return receipt card nor the enveloped marked unclaimed or refused, etc. In searching the USPS website today, it shows it was delivered to you on August 3, 2007. <http://www.usps.com/shipping/trackandconfirm.htm?from=home&page=0035trackandconfirm> See below:

Home | Help | Sign In
Track & Confirm FAQs
Label/Receipt Number: 7006 0100 0000 6012 9873
Status: Delivered
Your item was delivered at 9:00 AM on August 3, 2007 in CHICAGO, IL 60606.

Did you receive the complaint (indicating the green card must have been lost)? If so, are you planning on entering your appearance in the matter? Please contact me at your convenience to discuss service of the complaint. Thank you for your consideration.
Dave

David L. Wentworth II
Hasselberg, Williams, Grebe, Snodgrass & Birdsall
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Peoria, Illinois 61602-1320
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