

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)	
)	
RANDY GRANT)	
DONALD GRANT)	
PATRICIA WALLACE)	
)	
Complainants,)	PCB 2007-145
)	
v.)	
)	
MACH MINING LLC)	
)	
Respondent)	

MOTION TO WITHDRAW

NOW COMES Charles J. Northrup, attorney for Respondent, MACH MINING, LLC, and hereby moves to withdraw as counsel in this matter. In support, Movant states:

1. Charles J. Northrup and the law firm of Sorling, Northrup, Hanna, Cullen & Cochran, Ltd. have appeared in the above captioned matter as attorney for Respondent.
2. Charles J. Northrup has accepted a legal position with a not-for-profit association and will no longer be engaged in the private practice of law. The scope of his duties at his new employer, as well as the terms of that new employment, will not allow him to devote any time or resources to continuing representation of private clients, including the Respondent in this matter.
3. Charles J. Northrup has advised Respondent of his intent to withdraw and has given notice of this action.

Electronic Filing - Received, Clerk's Office, May 22, 2008

4. Charles J. Northrup has, consistent with Supreme Court of Illinois Rule of Professional Conduct 1.16(d) taken reasonable steps to avoid foreseeable prejudice to the Respondent including giving notice of this Motion.

5. All notices and official papers in this matter should be sent to:

Ms. Claire Manning
Brown, Hay & Stephens, LLP
205 S. 5th St.
Springfield, IL 62701

WHEREFORE, Charles J. Northrup respectfully requests that this tribunal allow him to withdraw from this matter, and for any other relief this tribunal deems appropriate.

Respectfully submitted,


Charles J. Northrup

Sorling, Northrup, Hanna,
Cullen & Cochran, Ltd.
Charles J. Northrup, of Counsel
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Springfield, IL 62705
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E-Mail: ejnorthrup@sorlinglaw.com

PROOF OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion to Withdraw was served by U.S. mail addressed:

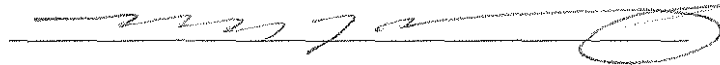
Ms. Patricia Wallace
17235 Liberty School Road
Marion, IL 62959

Mr. Randy Grant
17235 Liberty School Road
Marion, IL 62959

Mr. Donald Grant
17712 Dean Road
Johnston City, IL 62951

Mr. James Plumley
Williamson Energy
P. O. Box 300
Johnston City, IL 62951

with all postage prepaid on the 22nd day of May, 2008.

A handwritten signature in black ink, appearing to read "M. J. Plumley", written over a horizontal line.