## BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:

PRAIRIE RIVERS NETWORK,	)	
by and for its members,	)	
SIERRA CLUB, ILLINOIS	)	
CHAPTER, by and for its members	)	
	)	
	)	
Complainant,	)	
	)	
v.	) PCB 2010-061	
	) (Enforcement-Water	r)
FREEMAN UNITED COAL	)	
MINING CO., L.L.C., and	)	
SPRINGFIELD COAL CO., L.L.C.	)	
	)	
Respondents.	)	

## MOTION TO WITHDRAW AS ONE OF THE COUNSEL FOR RESPONDENT SPRINGFIELD COAL CO., L.L.C.

Pamela A. Howlett of the law firm of Bryan Cave, LLP, hereby moves to withdraw as one of the counsel for Respondent Springfield Coal Co., L.L.C ("Respondent"). Pamela A. Howlett is leaving Bryan Cave, though she will retain her law license. Defendants continue to be represented in this matter by Dale Guariglia of the law firm of Bryan Cave, who is lead counsel. Thus, this withdrawal will not delay these proceedings, nor will it be inequitable to any party. Respondent's interests also will be protected, and they will not be prejudiced as a result of the withdrawal.

WHEREFORE, Pamela A. Howlett respectfully requests that the Board grant her motion to withdraw as one of the counsel for Respondent Springfield Coal Co. L.L.C.

## Electronic Filing - Received, Clerk's Office, 05/27/2011

Respectfully Submitted,

**BRYAN CAVE LLP** 

Dale A. Guariglia, Missouri Bar #32998

Pamela A. Howlett #6281863

One Metropolitan Square

211 North Broadway Suite 3600

St. Louis, MO 63102

Telephone: (314) 259-2000 Telefax: (314) 259-2020

Attorneys for Respondent, Springfield Coal Co., L.L.C.

## **CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing response was served upon the following parties via U.S. Mail on the 27th day of May, 2011:

Thomas Davis Assistant Attorney General Environmental Bureau 500 South Second Street Springfield, IL 62706

Allison A. Torrence E. Lynn Grayson Jenner & Block LLP 353 N. Clark Street Chicago, IL 60654-3456

James A. Vroman James A. Vroman, P.C. 2S335 Arrowhead Drive Wheaton, IL 60189

Carol Webb Hearing Officer Illinois Pollution Control Board 1021 North Grand Avenue East Springfield, IL 62794

Jessica Dexter Environmental Law and Policy Center 35 East Wacker Drive, Suite 1300 Chicago, IL 60601

John Therriault, Clerk Illinois Pollution Control Board James R. Thompson Center 100 West Randolph St., Suite 11-500 Chicago, IL 60601

K. Moul Bailey