

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

ESTATE OF GERALD D.)	
SLIGHTOM,)	
Petitioner,)	
v.)	PCB No. 11-25
)	(LUST Permit Appeal)
ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY,)	
Respondent.)	

**MOTION TO SUPPLEMENT MOTION FOR AUTHORIZATION
OF PAYMENT OF ATTORNEY'S FEES**

NOW COMES Petitioner, ESTATE OF GERALD D. SLIGHTOM, by its undersigned counsel, and pursuant to Section 101.500 of the Board's Procedural Rules (35 Ill. Adm. Code § 101.500), moves to supplement a previously-filed motion, stating as follows:

1. On September 28, 2015, Petitioner filed Petitioner's Motion for Authorization of Payment of Attorney's Fees as Costs of Corrective Action.
2. Inadvertently, page 15 of Exhibit A-1 was omitted.
3. Attached hereto is a true and correct copy of page 15 of Exhibit A-1.
4. Undersigned counsel does not believe any undue prejudice will be posed in granting this motion, as Respondent has been given until October 19, 2015 to respond to the request for reimbursement of legal defense costs. (Order of Sept. 3, 2015)

WHEREFORE, Petitioner, prays for an order from the Board or Hearing Officer granting Petitioner leave to supplement the aforesaid motion with the omitted page of the exhibit, or such other relief as deemed meet and just.

Respectfully submitted,

ESTATE OF GERALD D. SLIGHTOM
Petitioner,

BY: LAW OFFICE OF PATRICK D. SHAW
Its attorneys

BY: /s/ Patrick D. Shaw

Patrick D. Shaw
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CSD Environmental Services

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	<u>Hrs/Rate</u>	<u>Amount</u>
SUBTOTAL:	[6.30	1,165.50]
<u>November 2013</u>		
11/20/2013 Receive & review Board order denying motion to dismiss; e-mail opinion to client w/ comments; receive e-mail questions from client and send reply	0.60 185.00/hr	111.00
11/21/2013 Telephone Melanie Jarvis; e-mail to client re Agency position and options	1.00 185.00/hr	185.00
11/22/2013 Telephone conf. w/ Jarvis about mtg w/ Kim; e-mail to client re Agency positions; receive e-mail from client and respond	0.90 185.00/hr	166.50
Research Board procedures for excess payments; draft memo; e-mail to client, responding to questions and forwarding memo	3.20 185.00/hr	592.00
11/27/2013 Briefing to PDS.	0.20 230.00/hr	46.00
SUBTOTAL:	[5.90	1,100.50]
<u>December 2013</u>		
12/2/2013 E-mail to client opinion on filing motion for reconsideration	0.50 185.00/hr	92.50
12/3/2013 E-mail to Jarvis re intent to file motion for reconsideration	0.10 185.00/hr	18.50
Telephone conference Hrg Officer and IEPA atty	0.10 185.00/hr	18.50
12/6/2013 Receive & review Hrg Officer Order	0.10 185.00/hr	18.50
12/9/2013 Review file and begin preparing motion for reconsideration	2.70 185.00/hr	499.50
12/10/2013 E-mail to client re status of payment; several e-mails re same; review docs received	0.80 185.00/hr	148.00
12/11/2013 Research authority of A.G. / lawyer to control litigation	4.50 185.00/hr	832.50
12/12/2013 Research reconsideration caselaw; draft motion for reconsideration	4.50 185.00/hr	832.50
12/13/2013 Draft and file waiver of decision deadline	0.10 185.00/hr	18.50