

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

In the Matter of:)	
)	
SIERRA CLUB, ENVIRONMENTAL)	
LAW AND POLICY CENTER,)	
PRAIRIE RIVERS NETWORK, and)	
CITIZENS AGAINST RUINING THE)	
ENVIRONMENT,)	
)	
Complainants,)	
)	
v.)	PCB No-2013-015
)	(Enforcement – Water)
MIDWEST GENERATION, LLC,)	
)	
Respondent.)	

NOTICE OF FILING

To: See attached Proof of Service List

PLEASE TAKE NOTICE that I have filed today with the Illinois Pollution Control Board the attached request for approval for me, Greg Wannier, to appear pro hac vice, and have also filed a Notice of Appearance, both of which are herewith served upon you.

Respectfully Submitted,



DATED: November 19, 2015

Greg Wannier
Associate Attorney
Sierra Club Environmental Law Program
85 Second Street, 2nd Floor
San Francisco, CA 94105
(415) 977-5646

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

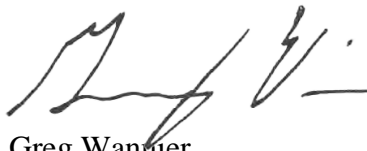
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LAW AND POLICY CENTER,)
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CITIZENS AGAINST RUINING THE)
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Complainants,)
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v.) PCB No-2013-015
) (Enforcement – Water)
MIDWEST GENERATION, LLC,)
)
Respondent.)

REQUEST TO APPEAR PRO HAC VICE

Pursuant to 35 Ill. Adm. Code Part 101.400(a), the undersigned requests approval by the Illinois Pollution Control Board to appear pro hac vice on behalf of the Sierra Club in connection with the above-titled matter.

In support of this request, the undersigned states that he is licensed and registered to practice before the State Bar of California (Bar No. 275349).

Respectfully Submitted,



DATED: November 19, 2015

Greg Wannier
Associate Attorney
Sierra Club Environmental Law Program
85 Second Street, 2nd Floor
San Francisco, CA 94105
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)	(Enforcement – Water)
MIDWEST GENERATION, LLC,)	
)	
Respondent.)	

APPEARANCE

The undersigned hereby re-enters his appearance on behalf of the Sierra Club.

Respectfully Submitted,



DATED: November 19, 2015

Greg Wannier
Associate Attorney
Sierra Club Environmental Law Program
85 Second Street, 2nd Floor
San Francisco, CA 94105
(415) 977-5646
greg.wannier@sierraclub.org

Electronic Filing - Received, Clerk's Office : 11/19/2015

Rule 707 Statement

Case No. PCB 2013-015; Sierra Club, Environmental Law & Policy Center, Prairie Rivers Network, and Citizens Against Ruining the Environment v. Midwest Generation, LLC

Verified Statement of Out-of-State Attorney Pursuant to Supreme Court Rule 707

I, Greg Wannier, submit this Verified Statement pursuant to Illinois Supreme Court Rule 707.

1. My full name is Gregory Eugene Wannier. The address of offices from which I practice law and related email address and telephone numbers are as follows:

85 Second Street, 2nd Floor, San Francisco, CA 94105
(415) 977-5646
greg.wannier@sierraclub.org

2. I represent Sierra Club in: Case No. PCB 2013-015 before the Illinois Pollution Control Board.
- 3(a). I have filed an appearance in Case No. PCB 2015-189 pursuant to this rule on May 12, 2015.
- 3(b). I have not received a registration number from the ARDC.
- 4(a). I list each jurisdiction of admission, including any state, territory, or commonwealth of the United States, the District of Columbia, or in a foreign country, and my full admission name and license number.

The State Bar of California, Gregory Eugene Wannier, Bar No. 275349.
- 4(b). I attach a letter or certificate of good standing for each of the jurisdictions listed in paragraph 4(a) above, as of May 8, 2015. Please let me know if you require a more recent certificate of good standing.
5. I have no office or other presence in Illinois for the practice of law.
6. I submit to the disciplinary authority of the Supreme Court of Illinois.
7. I have undertaken to become familiar with and to comply, as if admitted to practice in Illinois, with the rules of the Supreme Court of Illinois, including the Illinois Rules of Professional Conduct and the Supreme Court Rules on Admission and Discipline of Attorneys, and other Illinois law and practices that pertain to the proceeding.

9. I certify that I have served this Statement upon Environmental Law & Policy Center, Chicago Legal Clinic, Inc., Nijman Franzetti LLP, Environmental Integrity Project, & Faith E. Bugel, and that these parties are all entitled to service under this rule.

Verification

I verify the accuracy and completeness of each of the above statements.

A handwritten signature in black ink, appearing to read 'Greg Wannier', with a horizontal line extending to the right.

DATED: November 19, 2015

Greg Wannier
Associate Attorney
Sierra Club Environmental Law Program
85 Second Street, 2nd Floor
San Francisco, CA 94105
(415) 977-5646
greg.wannier@sierraclub.org

CERTIFICATE OF SERVICE

The undersigned certifies that true copies of the foregoing NOTICE OF FILING, REQUEST TO APPEAR PRO HAC VICE, and APPEARANCE were filed electronically on November 19, 2015 with the following:

John Therriault, Assistant Clerk
Illinois Pollution Control Board
100 West Randolph St
Suite 11-500
Chicago, IL 60601

And that true copies of the NOTICE OF FILING, REQUEST TO APPEAR PRO HAC VICE, and APPEARANCE were mailed by First Class Mail, postage prepaid, on November 19, 2015 on the parties listed on the foregoing Service List.



Miles Horton
Legal Assistant
Sierra Club Environmental Law Program
85 Second Street, 2nd Floor
San Francisco, CA 94105
(415) 977-5629

PCB 2015-189 SERVICE LIST:

Midwest Generation, LLC
401 East Greenwood Avenue
Waukegan, IL 60087

Susan M. Franzetti
Kristin Laughride Gale
Jennifer T. Nijman
Nijman Franzetti LLP
10 South LaSalle St., Ste. 3600
Chicago, IL 60603

Jennifer L. Cassel
Lindsay P. Dubin
Environmental Law & Policy Center
35 E. Wacker Dr.
Suite 1600
Chicago, IL 60601

Abel Russ
Environmental Integrity Project
1000 Vermont Ave. NW
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Washington, DC 20005

Keith I. Harley
Chicago Legal Clinic, Inc.
211 W. Wacker Dr.
Suite 750
Chicago, IL 60606



Supreme Court of California

FRANK A. McGUIRE
Court Administrator and Clerk of the Supreme Court

CERTIFICATE OF THE CLERK OF THE SUPREME COURT
OF THE
STATE OF CALIFORNIA

GREGORY EUGENE WANNIER

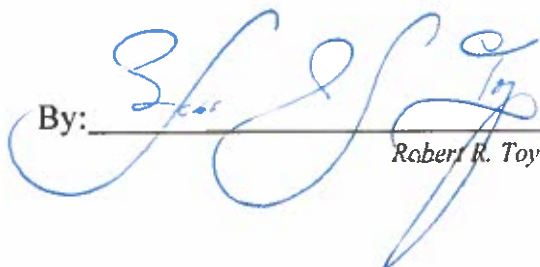
I, FRANK A. McGUIRE, Clerk of the Supreme Court of the State of California, do hereby certify that GREGORY EUGENE WANNIER was on the 25TH day of JANUARY, 2011, duly admitted to practice as an attorney and counselor at law in all the courts of this state; and is now listed on the Roll of Attorneys as a member of the bar of this state in good standing.

*Witness my hand and the seal of the court
on the 8TH day of MAY, 2015.*

FRANK A. McGUIRE

Clerk of the Supreme Court

By: _____


Robert R. Toy - Deputy Clerk