

State of Illinois
POLLUTION CONTROL BOARD
JAMES R. THOMPSON CENTER
100 W. RANDOLPH STREET, SUITE 11-500
CHICAGO, ILLINOIS 60601

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AUG 10 2006
STATE OF ILLINOIS
Pollution Control Board

MOTION FOR DEFAULT JUDGMENT

**BEFORE THE
ILLINOIS POLLUTION CONTROL BOARD**

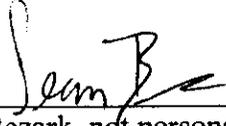
THE THEODORE KOSLOFF TRUST)
(As formed by the Irrevocable Agreement of)
Trust of Theodore Kosloff, dated)
December 6, 1989, for Rachel Kosloff and)
Abigail Kosloff, a Pennsylvania trust))
Complainant,)
v.) PCB 06-163
A&B WIREFORM CORPORATION)
Respondent.)

1. Complainant's name, street address, county, state: The Theodore Kosloff Trust
c/o Sean Bezark
Greenberg Traurig, LLP
77 West Wacker Drive, Suite 2500
Chicago, IL 60601
Phone: (312) 476-5027
2. Place where Complainant can be contacted during normal business hours: The Theodore Kosloff Trust
c/o Sean Bezark
Greenberg Traurig, LLP
77 West Wacker Drive, Suite 2500
Chicago, IL 60601
Phone: (312) 476-5027
3. Name and address of Respondent: A&B Wireform Corporation
ATTN: Mr. Connor Creevy
7525 Industrial Drive
Forest Park, IL 60130
4. Complainant filed a Formal Complaint against Respondent before the Illinois Pollution Control Board (the "Board") on May 3, 2006.
5. Complainant served the Formal Complaint upon Respondent by Certified United States Mail on May 3, 2006; Respondent accepted delivery of the Formal Complaint on May 8, 2006.
6. Neither Respondent nor Respondent's attorney have filed an appearance in the case.
7. Neither Respondent nor Respondent's attorney appeared for the status conference on June 29, 2006 with the Hearing Officer in this case.
8. Neither Respondent nor Respondent's attorney appeared for the status conference on July 20, 2006 with the Hearing Officer.
9. Neither Respondent nor Respondent's attorney appeared for the status conference on August 10, 2006 with the Hearing Officer.
10. Respondent failed to file an answer to the Formal Complaint within 60 days after it received the Formal Complaint.

Now comes the Complainant which hereby moves and respectfully requests that the Board find, rule and issue an Order that:

1. Because Respondent has failed to timely file an answer to the Formal Complaint, all allegations in the Formal Complaint are taken as if admitted by Respondent for purposes of this proceeding.
2. Respondent shall pay to Complainant all costs Complainant incurred to investigate and remediate the contamination caused by Respondent as described in the Formal Complaint.

3. Respondent shall cease and desist its chemical and state waste storage practices in the northwest corner of its parking lot and shall conduct a subsurface investigation and any required remediation in the vicinity of the drum storage area described in the Formal Complaint (and provide the results of that investigation and remediation to Complainant).

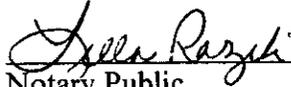


Sean Bezark, not personally, but solely as attorney for The Theodore Kosloff Trust

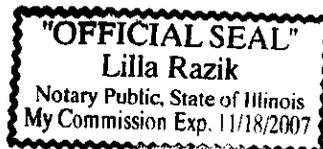
CERTIFICATION

I, Sean Bezark, not personally, but solely as attorney for The Theodore Kosloff Trust, state that I have read the foregoing and that it is accurate to the best of my knowledge.

Subscribed to and sworn before me
this 10th day
of August, 2006.


Notary Public

My commission expires: 11/18/07



CERTIFICATE OF SERVICE

I, the undersigned, on oath or affirmation, state that on August 10, 2006, I served the attached Motion for Default Judgment on the respondent by: (check appropriate line)

X certified mail (attach copy of receipt if available, otherwise you must file receipt later with Clerk)

_____ registered mail (attach copy of receipt if available, otherwise you must file receipt later with Clerk)

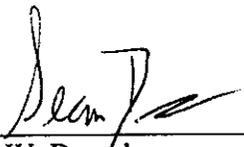
_____ messenger service (attach copy of receipt if available, otherwise you must file receipt later with Clerk)

_____ personal service (attach affidavit if available, otherwise you must file affidavit later with Clerk)

at the address below:

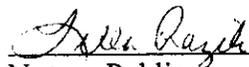
RESPONDENT'S ADDRESS:

A&B Wireform Corporation
7525 Industrial Drive
Forest Park, Illinois 60130



Sean W. Bezark
Greenberg Traurig, LLP
77 West Wacker Drive, Suite 2500
Chicago, Illinois 60601

Subscribed to and sworn before me
this 10th day
August, 2006.



Notary Public

My commission expires: 11/18/07

