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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

STATE OF ILLINOIS
Pollution Control Board

AMERICAN BOTTOM CONSERVANCY, and)
)
 SIERRA CLUB,)
)
 Co-Petitioners,)
)
 v.)
)
 CITY OF MADISON, ILLINOIS, and)
)
 WASTE MANAGEMENT OF ILLINOIS, INC.,)
)
 Respondents.)

EB PCB 07-84
 Pollution Control Facility
 (Siting Appeal)

MOTION FOR *PRO HAC VICE* ADMISSION OF KATHLEEN G. HENRY

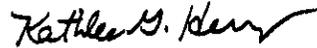
Pursuant to 35 Ill. Adm. Code § 101.400(a)(3), I, Kathleen G. Henry, respectfully request that the Illinois Pollution Control Board authorize me to appear *pro hac vice* in the above-captioned matter on behalf of petitioners American Bottom Conservancy and Sierra Club. The grounds for this motion are as follows:

1. I am a licensed attorney in the State of Missouri, where I was admitted to practice law in 1989. My attorney registration number in Missouri is 39504, and I am in good standing.
2. I am a licensed attorney in the State of Illinois, where I was admitted to practice law in 1990. I have been on inactive status since then. My attorney registration number in Illinois is 6203060.
3. I am a licensed attorney in the District of Columbia, where I was admitted to practice law in 1999. My attorney registration number is 464240. I resigned from that bar in 2000.
4. I am a member in good standing of the bars of the following federal courts: US District Court for the Eastern District of Missouri; US District Court for the District of Columbia; US Court of Appeals for the Seventh Circuit; and the US Court of Appeals for the Eighth Circuit.

5. No disciplinary proceedings are pending or have ever been brought against me.
6. I have never been disbarred or subject to disbarment proceedings.
7. Petitioners American Bottom Conservancy and Sierra Club are represented by Great Rivers Environmental Law Center. I am the President of Great Rivers.
8. I am familiar with the Illinois Code of Civil Procedure, Illinois Supreme Court Rules, and the Rules of the Illinois Pollution Control Board and I understand and agree to be bound by them in all proceedings before the Illinois Pollution Control Board.
9. With the Board's permission, attached is my Entry of Appearance in this matter.

WHEREFORE, I, Kathleen G. Henry, respectfully request permission to appear *pro hac vice* on behalf of petitioners American Bottom Conservancy and Sierra Club.

Respectfully submitted,



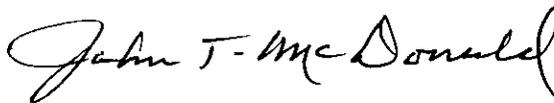
Kathleen G. Henry
President, Great Rivers Environmental Law Center
705 Olive Street, Ste. 614
St. Louis, MO 63101
(314) 231-4181
(314) 231-4184 (facsimile)
khenry@greatriverslaw.org

Dated:

Subscribed and sworn to before me this 18th day of April, 2007.

City, State, Zip code:

JOHN T. McDONALD
Notary Public - Notary Seal
STATE OF MISSOURI
St. Louis County
Commission #05472066
My Commission Expires June 25, 2009



CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 18th day of April, 2007, a complete copy of this instrument was served upon counsel for defendants by enclosing the same in an envelope and depositing such envelope, with first class postage fully prepaid, in a United States post office box in St. Louis, Missouri, addressed to:

Donald J. Moran
Pedersen & Houpt
161 North Clark Street
Suite 3100
Chicago, IL 60601-3224

Penni S. Livingston
Livingston Law Firm
5701 Perrin Road
Fairview Heights, IL 62208

John T. Papa
Callis, Papa, Hale, Szewczyk & Danzinger, PC
1326 Niedringhaus Avenue
Granite City, IL 62040

Kathleen M. King

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ENTRY OF APPEARANCE BY KATHLEEN G. HENRY

Comes now Kathleen G. Henry, attorney for petitioners, and hereby enters her appearance on the above-styled cause.

Respectfully submitted,



Kathleen G. Henry
 Great Rivers Environmental Law Center
 705 Olive Street, Ste. 614
 St. Louis, MO 63101
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 (314) 231-4184 (facsimile)
khenry@greatriverslaw.org

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Kathleen M. Day