## BEFORE THE ILLINOIS POLLUTION CONTROL BOARD APR 1 4 2008 ADMINISTRATIVE CITATION STATE OF ILLINOIS

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,

Complainant,

v.

C. JOHN BLICKHAN,

Respondent.

### **NOTICE OF FILING**

TO: Mr. John Therriault Assistant Clerk of the Board Illinois Pollution Control Board 100 West Randolph Street Suite 11-500 Chicago, IL 60601

(SEE PERSONS ON ATTACHED SERVICE LIST)

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Illinois Pollution Control Board a *Motion for Substitution of Counsel*, copies of which are herewith served upon you.

Dated: April \$, 2008

Respectfully submitted,

AC 07-24

(IEPA NO. 304-06-AC)

C. JOHN BLICKHAN, Respondent

RECE

CLERK'S OFFICE

Pollution Control Board

Jon 8. Faletto One of His Attorneys

Jon S. Faletto Hinshaw & Culbertson LLP 416 Main Street, 6th Floor Peoria, IL 61602 309-674-1025

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# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,

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### AC 07-24 CLERK'S OFFICE APR 1 4 2008 STATE OF ILLINOIS Pollution Control Board (IEPA NO. 304-06-AC)

v.

C. JOHN BLICKHAN,

Respondent.

### **MOTION FOR SUBSTITUTION OF COUNSEL**

NOW COMES the Respondent, C. JOHN BLICKHAN, and moves the Illinois Pollution Control Board pursuant to the Board's procedural rules at 35 Ill. Admin. Code §101.400(c), to substitute Jon S. Faletto of the firm of HINSHAW & CULBERTSON LLP as counsel of record for the Respondent, C. JOHN BLICKHAN, in place of Defendant's current counsel, Dennis G. Woodworth of the firm of BLICKHAN, TIMMERWILKE, WOODWORTH & LARSON.

Concurrent with the filing of this Motion for Substitution of Counsel, Attorney Jon S. Faletto will be filing with the Board a written Notice of Appearance, pursuant to and in accordance with the Board's procedural rules at 35 Ill. Admin. Code §101.400(a)(4), documenting and providing notice of his representation of the Respondent in these proceedings.

Dennis G. Woodworth Jon S. Faletto

Blickhan, Timmerwilke, Woodworth & Larson

Hinshaw & Culbertson LLP

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#### **CERTIFICATE OF SERVICE**

I, Jon S. Faletto, the undersigned, hereby certify that I have served the attached Motion

for Substitution of Counsel upon:

Michelle M. Ryan, Esq. Assistant Counsel Illinois Environmental Protection Agency 1021 North Grand Avenue East P.O. Box 19276 Springfield, IL 62794-9276

John T. Therriault Assistant Clerk of the Board Illinois Pollution Control Board James R. Thompson Center 100 W. Randolph St., Ste. 11-500 Chicago, IL 60601

Dennis G. Woodworth Blickhan, Timmerwilke, Woodworth & Larson 435 Hampshire St. Quincy, IL 62301

By depositing said documents in the United States Mail, postage prepaid, in Peoria, Illinois, on

April **%**, 2008.

& laltto Jon S. Faletto

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