

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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AUG 27 2010

STATE OF ILLINOIS
Pollution Control Board

PEOPLE OF THE STATE OF
ILLINOIS,

Complainant,

vs.

Case No: PCB No. 07-53

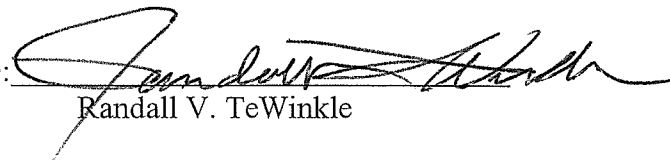
MOLINE PLACE DEVELOPMENT, L.L.C.

Respondent.

ENTRY OF APPEARANCE

I hereby enter my appearance as Counsel for Respondent, MOLINE PLACE DEVELOPMENT,
L.L.C. in the above entitled case.

SIGNED:



Randall V. TeWinkle

Dated: August 25, 2010

Randall V. TeWinkle
Attorney for Respondent, MOLINE PLACE DEVELOPMENT
455 Avenue of the Cities
East Moline, IL 61244
Ph: (309) 755-3400 x112
F: (309) 755-5522
ARDC# 6188218

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Case No: PCB No. 07-53 STATE OF ILLINOIS
Pollution Control Board

MOLINE PLACE DEVELOPMENT, L.L.C.
Respondent.

**MOTION FOR LEAVE TO FILE
A RESPONSE TO COMPLAINANT'S SUMMARY JUDGMENT**

1. Respondent, MOLINE PLACE DEVELOPMENT, L.L.C. has recently hired the undersigned attorney to defend it in the above entitled case.
2. Thereafter, the undersigned attorney applied for reinstatement to practice law in Illinois and he was reinstated on August 23, 2010.
3. Along with this Motion, Counsel for Respondent includes for filing with the Illinois Pollution Control Board his Entry of Appearance and Notice of Filing.
4. This matter is scheduled for a telephone status conference with the Hearing Officer at 10:00 a.m. on October 12, 2010.
5. Before the next status conference, respondent's attorney respectfully requests an opportunity to respond to complainant's motion for summary judgment.
6. The proposed deadline to file a response to the motion for summary judgment and any opposing affidavits is September 25, 2010 or to a time the Board deems just,

Wherefore, Respondent, MOLINE PLACE DEVELOPMENT, L.L.C. respectfully requests the Board to granting Respondent's request to respond to complainant's motion for summary judgment to and until September 25, 2010 or to a time the Board deems just.

SIGNED: _____

Randall V. TeWinkle

Dated: August 25, 2010

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East Moline, IL 61244
Ph: (309) 755-3400 x112
F: (309) 755-5522
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PEOPLE OF THE STATE OF
ILLINOIS,

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vs.

MOLINE PLACE DEVELOPMENT, L.L.C.

Respondent.

Case No: PCB No. 07-53

CERTIFICATE OF SERVICE

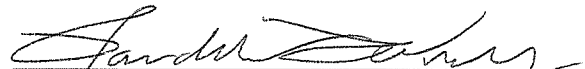
The undersigned, hereby certifies that I have served the following interested parties, with a copy of Respondent, Moline Place Development, LLC'S Entry of Appearance and Motion to Respond to Summary Judgment Motion:

Carol Webb, Esq.
Hearing Officer
Illinois Pollution Control Board
1021 North Grand Avenue East
P.O. Box 19274
Springfield, IL 62794-9274

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

Raymond J. Callery, Esq.
Office of the Attorney General
500 South Second Street
Springfield, IL. 62706

by depositing said document in the United States Mail, postage prepaid, in a U.S. Post Office Mail Box in East Moline, Illinois, on the 25th day of August, 2009.


Randall V. TeWinkle