

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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JUL 23 2012

STATE OF ILLINOIS
Pollution Control Board

PEOPLE OF THE STATE OF ILLINOIS)

Complainant,)

v.)

KEHRER BROTHERS CONSTRUCTION)
INC., an Illinois corporation)

Respondent.)

PCB NO. 2012-132
(Enforcement - Land)

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MOTION TO APPEAR PRO HAC VICE

Pursuant to 35 Ill. Admin. Code 101.400(a)(3), the undersigned counsel, Richard E. Greenberg of Greensfelder, Hemker & Gale, P.C., respectfully moves this Board for an order granting admission *pro hac vice* for the purpose of appearing as counsel on behalf of Respondent Kehrer Brothers Construction Inc. in the above-styled cause only. In support of this motion, the undersigned states:


- I am admitted to practice in the following state and federal jurisdictions:
 - State of New York, admitted 1981;
 - District of Columbia, admitted 1981;
 - State of Missouri, admitted 1988;
 - United States Court of Appeals, Eighth Circuit, admitted 1988;
 - United States Court of Appeals, Ninth Circuit, admitted 1984;
 - United States District Court, Eastern District of Missouri, admitted 1988;
 - United States District Court, Central District of Illinois, admitted 2002.

2. I certify that I am a member in good standing of all Courts to which I am admitted.
3. I am not licensed, nor have I applied, to practice law in the State of Illinois.
4. I am not currently the subject of any professional disciplinary sanction, proceeding or investigation in any jurisdiction.
5. I certify that I will abide by the Illinois Pollution Control Board's Code of Professional Conduct.

WHEREFORE, the undersigned counsel respectfully requests this Court enter an order of admission *pro hac vice* for purposes of this cause only.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 19, 2012



Richard E. Greenberg
reg@greensfelder.com
GREENSFELDER, HEMKER & GALE, P.C.
10 South Broadway, Suite 2000
St. Louis, MO 63102
Telephone: (314) 241-9090
Facsimile: (314) 345-4792

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing document was served upon the attorney set forth below, by enclosing same in an envelope addressed to said attorney, with first-class postage thereon fully prepaid and by depositing said envelope in a U.S. Post Office mailbox in St. Louis, Missouri, on the 20th day of July, 2012.

Raymond J. Callery
Assistant Attorney General
500 South Second Street
Springfield, Illinois 62706

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JUL 23 2012

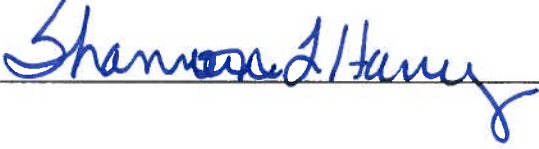
**STATE OF ILLINOIS
Pollution Control Board**

A handwritten signature in black ink, consisting of a vertical line followed by a horizontal line that curves back to the left, positioned above a horizontal line.

CERTIFICATE OF SERVICE

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Raymond J. Callery
Assistant Attorney General
500 South Second Street
Springfield, Illinois 62706



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ORDER GRANTING MOTION TO APPEAR *PRO HAC VICE*

This cause has come before the Court upon the Motion of Richard E. Greenberg, counsel for Respondent Kehrer Brothers Construction Inc., for leave to appear and participate *pro hac vice* in the above-captioned cause only. Being fully advised, it is now

ORDERED that the Motion be, and hereby is GRANTED.

Dated this _____ day of _____, 2012.



Greensfelder, Hemker & Gale, P.C.
10 South Broadway, Ste. 2000
St. Louis, MO 63102

T: 314-241-9090
F: 314-241-8624
www.greensfelder.com

Chicago Office:
200 West Madison St., Ste. 3440
Chicago, IL 60606
T: 312-419-9090

Belleville Office:
12 Wolf Creek Dr., Ste. 100
Belleville, IL 62226
T: 618-257-7308

Shannon L. Haney
Direct Dial 314/345-4779
Direct Fax 314/345-4792

July 19, 2012

Pollution Control Board, Attn: Clerk
100 West Randolph Street
James R. Thompson Center, Suite 11-500
Chicago, Illinois 60601-3218

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STATE OF ILLINOIS
Pollution Control Board

Re: State of Illinois v. Kehrer Brothers Construction, Inc.
PCB No. 2012-132
(Enforcement – Land)

Dear Clerk:

Enclosed for filing please find an original and nine (9) copies of our Entry of Appearance, Motion to Appear *Pro Hac Vice* and Proposed Order in the above-captioned matter. Please return a file-stamped copy to the undersigned in the enclosed self-addressed stamped envelope.

Thank you for your assistance in this matter.

Sincerely,

GREENSFELDER, HEMKER & GALE, P.C.

By


Shannon L. Haney

SLH/seh
Enclosures
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