

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

METROPOLITAN WATER RECLAMATION	)	
DISTRICT OF GREATER CHICAGO,	)	
	)	
Petitioner,	)	PCB 16-28
	)	(Time-Limited Water Quality Standard)
v.	)	
	)	
ILLINOIS ENVIRONMENTAL	)	
PROTECTION AGENCY	)	
	)	
Respondent.	)	

To: See attached service list.

**NOTICE OF ELECTRONIC FILING**

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Pollution Control Board a Motion to Substitute Counsel on behalf of the Illinois Environmental Protection Agency, a copy of which is herewith served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY,

Respondent,

BY: /s/Rex L. Gradeless  
Rex L. Gradeless  
Assistant Counsel

Dated: June 15, 2018

Rex L. Gradeless, #6303411  
Division of Legal Counsel  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, IL 62794-9276  
(217) 782-5544  
[Rex.Gradeless@Illinois.gov](mailto:Rex.Gradeless@Illinois.gov)

**SERVICE LIST**

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

Stefanie N. Diers  
Sara Terranova  
Rex L. Gradeless  
1021 North Grand Ave East  
Springfield, IL 62794-9276

METROPOLITAN WATER RECLAMATION DISTRICT

Margaret T. Conway  
100 East Erie Street  
Chicago, IL 60611

LAW FIRM OF ALBERT ETTINGER

Albert Ettinger  
53 W. Jackson  
Suite 1664  
Chicago, IL 60604

BARNES & THORNBURG

Fredric P. Andes  
Paul M. Drucker  
1 North Wacker Drive  
Suite 4400  
Chicago, IL 60606

CLERK OF THE ILLINOIS POLLUTION CONTROL BOARD

Don Brown  
James R. Thompson Center  
100 W. Randolph Street  
Suite 11-500  
Chicago, IL 60601

HEARING OFFICER OF THE ILLINOIS POLLUTION CONTROL BOARD

Bradley P. Halloran  
James R. Thompson Center  
100 W. Randolph Street  
Suite 11-500  
Chicago, IL 60601

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ILLINOIS ENVIRONMENTAL	)	
PROTECTION AGENCY	)	
	)	
Respondent.	)	

**MOTION TO SUBSTITUTE COUNSEL**

NOW COMES the Respondent, the Illinois Environmental Protection Agency, by and through its counsel, and for its Motion to Substitute Counsel, states as follows:

1. Respondent’s Assistant Counsel Sara Terranova is no longer assigned to represent the Respondent in this matter.
2. Respondent’s Assistant Counsel Rex L. Gradeless is now assigned to represent the Respondent in this matter.
3. It is requested that Respondent’s Assistant Counsel Sara Terranova be removed as counsel for Respondent in this matter.

WHEREFORE, for the above and foregoing reasons, Respondent respectfully requests the Hearing Officer allow the substitution of Respondent’s Assistant Counsel Rex L. Gradeless for Respondent’s Assistant Counsel Sara Terranova and that Respondent’s Assistant Counsel Sara Terranova be removed as counsel for the Respondent in this matter.

Respectfully submitted,

Dated: June 15, 2018

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY,

Rex L. Gradeless, #6303411  
Division of Legal Counsel

Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, IL 62794-9276  
(217) 782-5544  
[Rex.Gradeless@Illinois.gov](mailto:Rex.Gradeless@Illinois.gov)

Respondent,

BY: /s/Rex L. Gradeless  
Rex L. Gradeless  
Assistant Counsel

**CERTIFICATE OF SERVICE**

I, the undersigned, on affirmation state the following:

That I have served the attached **MOTION TO SUBSTITUTE COUNSEL** by e-mail upon Don Brown at the e-mail address of [Don.Brown@illinois.gov](mailto:Don.Brown@illinois.gov), Sara Terranova at the email address of [Sara.Terranova@illinois.gov](mailto:Sara.Terranova@illinois.gov), Stefanie N. Diers at the email address of [Stefanie.Diers@illinois.gov](mailto:Stefanie.Diers@illinois.gov), Margaret T. Conway at the email address of [Margaret.conway@mwr.org](mailto:Margaret.conway@mwr.org), Albert Ettinger at the email address of [ettinger.albert@gmail.com](mailto:ettinger.albert@gmail.com), Fredric P. Andes at the email address of [fandes@btlaw.com](mailto:fandes@btlaw.com), Paul M. Drucker at the email address of [pdrucker@btlaw.com](mailto:pdrucker@btlaw.com), and upon Hearing Officer Bradley P. Halloran at the e-mail address of [Brad.Halloran@Illinois.gov](mailto:Brad.Halloran@Illinois.gov).

That my e-mail address is [Rex.Gradeless@illinois.gov](mailto:Rex.Gradeless@illinois.gov).

That the number of pages in the e-mail transmission is five (5).

That the e-mail transmission took place before 5:00 p.m. on the date of June 15, 2018.

/s/Rex L. Gradeless

June 15, 2018