

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

In the Matter of:)	
)	
SIERRA CLUB, ENVIRONMENTAL)	
LAW AND POLICY CENTER,)	
PRAIRIE RIVERS NETWORK, and)	
CITIZENS AGAINST RUINING THE)	
ENVIRONMENT)	
)	PCB No-2013-015
Complainants,)	(Enforcement – Water)
)	
v.)	
)	
MIDWEST GENERATION, LLC,)	
)	
Respondents)	

NOTICE OF FILING

To: Attached Service List

PLEASE TAKE NOTICE that on July 29, 2014, I electronically filed with the Clerk of the Illinois Pollution Control Board a MOTION TO WITHDRAW PRO HAC VICE MOTION AND APPEARANCE OF WHITNEY FERRELL ON BEHALF OF THE SIERRA CLUB, copies of which are served on you along with this notice.

Respectfully submitted,



Jennifer L. Cassel
Staff Attorney
Environmental Law & Policy Center
35 E. Wacker Dr., Suite 1600
Chicago, IL 60601
jcassel@elpc.org
ph (312) 795-3726

Dated: July 29, 2014

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SIERRA CLUB, ENVIRONMENTAL)	
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Complainants,)	(Enforcement – Water)
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v.)	
)	
MIDWEST GENERATION, LLC,)	
)	
Respondents)	

**MOTION TO WITHDRAW PRO HAC VICE MOTION AND APPEARANCE OF
WHITNEY FERRELL ON BEHALF OF THE SIERRA CLUB**

Complainants Sierra Club, Environmental Law and Policy Center (“ELPC”), Prairie Rivers Network, and Citizens Against Ruining the Environment (“CARE”) (collectively, “Citizens Groups”), by and through its counsel, respectfully asks the Board to withdraw the appearance of Whitney Ferrell (*pro hoc vice motion pending*) on behalf of the Sierra Club, and in support thereof states as follows:

1. Citizen Groups are currently represented in this action by Jennifer Cassel and Faith Bugel of the Environmental Law and Policy Center (representing ELPC, Sierra Club and Prairie Rivers Network); Keith Harley of the Chicago Legal Clinic (representing CARE), and Abel Russ of the Environmental Integrity Project (*pro hoc vice motion pending to represent Sierra Club*).
2. Ms. Ferrell has resigned from the Environmental Integrity Project as of July 23, 2014.
3. Accordingly, Citizen Groups respectfully request that the Board grant Complainants’ motion to withdraw Whitney Ferrell’s *pro hac vice* motion and appearance as counsel for Sierra Club, both filed on December 5, 2012.

Respectfully submitted this 29th day of July, 2014.

/s/ Jennifer Cassel

Jennifer L. Cassel
Faith E. Bugel
Environmental Law & Policy
Center
35 E. Wacker Dr., Suite 1600
Chicago, IL 60601
jcassel@elpc.org
312-795-3726 (phone)
312-795-3730 (fax)

*Attorneys for ELPC, Sierra Club
and Prairie Rivers Network*

Abel Russ
Attorney
Environmental Integrity Project
One Thomas Circle, Suite 900
Washington, DC 20005
aruss@environmentalintegrity.org
202-263-4453 (phone)
202-296-8822 (fax)

*Attorney for Sierra Club (pro hac
vice motion pending)*

Keith Harley
Chicago Legal Clinic, Inc.
211 W. Wacker, Suite 750
Chicago, IL 60606
kharley@kentlaw.iit.edu
312-726-2938 (phone)
312-726-5206 (fax)

Attorney for CARE

CERTIFICATE OF SERVICE

The undersigned certifies that a true copy of the foregoing NOTICE OF FILING and MOTION TO WITHDRAW PRO HAC VICE MOTION AND APPEARANCE OF WHITNEY FERRELL ON BEHALF OF THE SIERRA CLUB was filed electronically on July 29, 2014 with the following:

John Therriault, Assistant Clerk
Illinois Pollution Control Board
100 West Randolph St
Suite 11-500
Chicago, IL 60601

And that true copies of the NOTICE OF FILING and MOTION TO WITHDRAW PRO HAC VICE MOTION AND APPEARANCE OF WHITNEY FERRELL ON BEHALF OF THE SIERRA CLUB were mailed by First Class Mail, postage prepaid, on July 29, 2014 on the parties listed on the foregoing Service List.

/s/ Robert M. Gelles
Robert M. Gelles
Legal Assistant
Environmental Law & Policy Center
35 E Wacker Drive, Suite 1600
Chicago, Illinois 60601
312-795-3718

PCB 2013-015 SERVICE LIST:

Jennifer T. Nijman
NIJMAN FRANZETTI LLP
10 South LaSalle Street, Suite 3600
Chicago, IL 60603

Bradley P. Halloran, Hearing Officer
Illinois Pollution Control Board
100 West Randolph St
Suite 11-500
Chicago, IL 60601

CT Corporation Systems
Midwest Generation, LLC
208 South LaSalle Street Suite 814
Chicago, IL 60604