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STATE OF ILLINOIS
Pollution Control Board

LAW OFFICES OF JEFFREY M. SMITH

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OF COUNSEL TO:

SCHAFFER, LAX, McNAUGHTON & CHEN

September 12, 2003

Mara S. Georges
Corporation Counsel
City of Chicago Department of Law
30 N. LaSalle Street, Suite 900
Chicago, IL 60602

Re: **The City of Chicago v. Purex Industries, Inc., et al.**
Illinois Pollution Control Board Case No. PCB 04-29

Dear Ms. Georges:

On September 8, 2003, my office received, via federal express, the enclosed Notice of Filing and Commencement of Enforcement Proceeding, and Notice of Filing (motion to consolidate) in the captioned matter. We are returning these documents because your service list identifies my office as the "authorized agent of Purex Industries, Inc."; and, that the United States Corporation Company is the "Registered agent of Purex Industries, Inc. Neither of the statements is correct; therefore, your service is improper and defective.

Furthermore, your complaint alleges that Purex Industries, Inc.'s (Purex) principal place of business is located at 535 E. Alondra Boulevard, Gardena, California 90248. This also is incorrect. Purex does not own the property located at 535 E. Alondra Boulevard, Gardena, California, and neither that property nor any other property is the "principal place of business" of Purex, because Purex is a dissolved corporation and has no principal place of business.

In February 1985, Purex began its complete dissolution. Since Purex was a Delaware corporation, a Certificate of Dissolution was filed with the Delaware Secretary of State on April 5, 2000, and Purex completed its dissolution on April 4, 2003. Purex no longer exists - it is a dead and buried corporate entity.

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Under penalty of perjury, and under the laws of the State of California, I do affirm that the facts stated herein are true, and if called as a witness, could and would competently testify thereto.

Best regards,
LAW OFFICES OF JEFFREY M. SMITH

By


Jeffrey M. Smith

JMS:sc
Enclosures

cc: Office of the Clerk
Illinois Pollution Control Board