

Carolyn K. Gerwin
705 South Locust Street
Pontiac IL 61764
(815)842-2486

July 23, 2003

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STATE OF ILLINOIS
Pollution Control Board

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

Re: - CALE v. American Disposal Services, No. PCB 03-236: Addendum to Memorandum in Opposition to Motion to Dismiss Petition for Review; Motion for Designation of Lead Counsel

Dear Sir:

Please find enclosed for filing one original and nine copies of Petitioner Citizen Against Landfill Expansion's (1) Exhibit D to Petitioner's Memorandum in Opposition to Applicant's Motion to Dismiss (Statement of Barb Christensen), which was inadvertently omitted from the original filing; and (2) Motion for Designation of Lead Counsel. Thank you.

Yours truly,


Carolyn K. Gerwin
Counsel for Petitioner

Cc: Counsel of Record (w/enc)

EXH. D
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STATE OF ILLINOIS
Pollution Control Board

To Whom it may concern,

I am part of a local group of Livingston County residents called Citizens Against the Landfill Expansion. We were represented by Carolyn Gerwin, Doris Burnside, Julie Russow, Barb Christensen and others at the siting hearing for the Livingston Landfill held Mar. 10th thru the 14th . 2003.

We are appealing the approval by the Livingston County Board for the expansion of the landfill.

Sincerely,

Barbara J. Christensen 6-19-03
Signed Name Date

BARBARA J. CHRISTENSEN
Printed Name

106 S. CLINTON ST.
Street

DWIGHT IL
City and State

Witnessed by:

Doris E. Burnside 6-19-03
Date

**BEFORE THE ILLINOIS
POLLUTION CONTROL BOARD**

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Citizens Against Landfill Expansion,)
Petitioners)
)
v.)
)
American Disposal Services of Illinois, Inc.)
Respondent,)
)
and)
)
Livingston County Board, Livingston County,)
Illinois, Respondent)

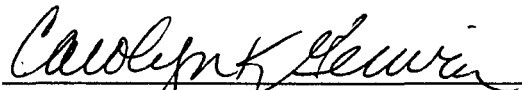
STATE OF ILLINOIS
Pollution Control Board

No. PCB 03-236

MOTION FOR DESIGNATION OF LEAD COUNSEL BY RESPONDENTS

Citizens Against Landfill Expansion, an unincorporated association of residents of Livingston County (hereinafter "CALE"), has petitioned for review of local siting of a 50 million cubic yard expansion of the Livingston Landfill in Pontiac, Illinois. Two sets of counsel have appeared on behalf of Respondent American Disposal Services of Illinois, Inc. ("Applicant") (namely, George Mueller, P.C., and Douglas Lee of Ehrmann, Gehlbach, Badger & Lee) and two other sets of counsel have appeared on behalf of Respondent Livingston County Board (C. Thomas Blakeman of Strong, Blakeman & Schrock and Larry M. Clark, Attorney at Law). Petitioner CALE hereby requests that the Hearing Officer order Respondents to designate lead counsel. The multiplicity of appearances by Petitioners' counsel is an undue hardship to CALE with regard to copying and postage, especially in light of the potentially bulky exhibits in this matter. If Respondents wish to have the benefit of multiple sets of counsel in this matter, Respondents should bear the extra burden associated with such multiple representations.

Respectfully submitted,



Carolyn K. Gerwin, Attorney at Law
Counsel for Citizens Against Landfill Expansion

Carolyn K. Gerwin
Attorney at Law
705 South Locust Street
Pontiac, Illinois 61764
(815) 842-2486

EXHIBIT D

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing Motion for Designation of Lead Counsel as follows:

On July ²⁴23, 2003, I mailed one original and 9 copies thereof to the Illinois Pollution Control Board, by U.S. Mail, return receipt requested and postage prepaid, to:

Illinois Pollution Control Board:

Pollution Control Board

Attn: Clerk

100 West Randolph Street

James R. Thompson Center, Suite 11-500

Chicago, Illinois 60601-3218

On July ²⁴23, 2003, I sent a true and correct copy thereof by U.S. Mail to:

Douglas E. Lee

Ehrmann, Gehlbach, Badger & Lee

215 E. First Street, Suite 100

P.O. Box 447

Dixon, Illinois 61021

C. Thomas Blakeman

Strong, Blakeman & Schrock

307 West Washington Street

Pontiac, Illinois 61764

George Mueller, P.C.

Attorney at Law

501 State Street

Ottawa, IL 61350

Larry M. Clark

Suite 200

700 North Lake Street

Mundelein IL 60060

Carolyn K. Herwin