

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

Paul Christian Pratapas)	
)	
Complainant,)	PCB No. 2023-014
)	(Enforcement)
v.)	
)	
Horizon Construction Group, Inc.)	
)	
Respondent.)	

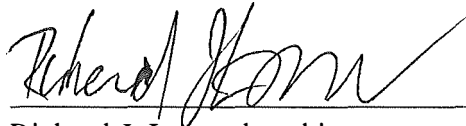
NOTICE OF FILING

To:	Paul Christian Pratapas	Don Brown - Clerk of the Board
	330 E. Chicago Ave. #110	100 W. Randolph St. Suite 11-500
	Naperville, IL 60540	Chicago, IL 60601

PLEASE TAKE NOTICE that I have filed today with the Illinois Pollution Control Board the attached request for approval for me, Richard J. Lewandowski, to appear pro hac vice, and have also filed a Notice of Appearance, both of which are herewith served upon you.

Dated: November 30, 2022

Respectfully submitted,



Richard J. Lewandowski
Husch Blackwell LLP
33 East Main Street, Suite 300
Madison, WI 53703
(608) 255- 4440
richard.lewandowski@huschblackwell.com

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

Paul Christian Pratapas)	
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Complainant,)	PCB No. 2023-014
)	(Enforcement)
v.)	
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Horizon Construction Group, Inc.)	
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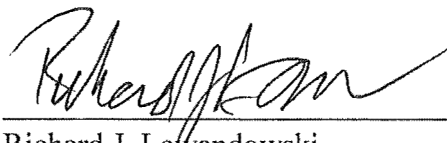
REQUEST TO APPEAR PRO HAC VICE

Pursuant to 35 Ill. Adm. Code Part 101.400(a), the undersigned requests approval by the Illinois Pollution Control Board to appear pro hac vice on behalf of the Respondent, Horizon Construction Group, Inc. in connection with the above-titled matter.

In support of this request, the undersigned states that he is licensed and registered to practice before the State Bar of Wisconsin (Bar No. 1018459).

Dated this 30th day of November 2022.

HUSCH BLACKWELL LLP



Richard J. Lewandowski
Husch Blackwell LLP
33 East Main Street, Suite 300
Madison, WI 53703
(608) 255- 4440
richard.lewandowski@huschblackwell.com

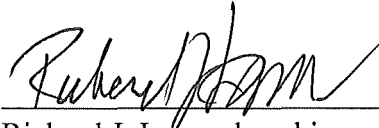
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)	
Complainant,)	PCB No. 2023-014
)	(Enforcement)
v.)	
)	
Horizon Construction Group, Inc.)	
)	
Respondent.)	

NOTICE OF APPEARANCE

I hereby file my appearance in this proceeding on behalf of Horizon Construction Group, Inc.

HUSCH BLACKWELL LLP



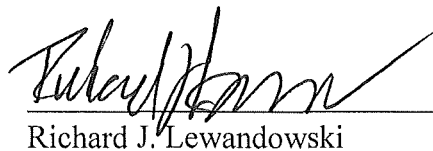
Richard J. Lewandowski
Husch Blackwell LLP
33 East Main Street, Suite 300
Madison, WI 53703
(608) 255- 4440
richard.lewandowski@huschblackwell.com

CERTIFICATE OF SERVICE

I, the undersigned, certify that I have served the attached Appearance upon the following persons, delivery costs prepaid, by depositing same in the U.S mail, return receipt requested by the time of 5:00 p.m. on November30, 2022, with proper postage or delivery charges prepaid addressed to:

Paul Christian Pratapas 1330 E. Chicago Ave.
#110 Naperville, IL 60540

Don Brown - Clerk of the Board 100 W.
Randolph St. Suite 11-500
Chicago, IL 60601



Richard J. Lewandowski

Rule 707 Statement

Case No. PCB 2023-014; Paul Christian Pratapas v. Horizon Construction Group, Inc.

Verified Statement of Out-of-State Attorney Pursuant to Supreme Court Rule 707

I, Richard J. Lewandowski, submit this Verified statement pursuant to Illinois Supreme Court Rule 707.

1. My full name is Richard J. Lewandowski. The address of offices from which I practice law and related email address and telephone numbers are as follows:

Husch Blackwell, LLP
33 East Main Street, Suite 300
Madison, WI 53703
(608) 255- 4440
richard.lewandowski@huschblackwell.com

2. I represent Horizon Construction Group, Inc. in: Case No. PCB 2023-014 before the Illinois Pollution Control Board.

3(a). I have not filed any other appearance pursuant to this rule during this calendar year.

3(b). I have not received a registration number from the ARDC.

4(a). I list each jurisdiction of admission, including any state, territory, or commonwealth of the United States, the District of Columbia, or in a foreign country, and my full admission name and license number.

State Bar of Wisconsin, Richard J. Lewandowski, Wisc. Bar No. 1018459.

I am also admitted to practice in and have appeared before the following courts:

U.S. Supreme Court
U.S. Court of Appeals, Seventh Circuit
U.S. District Court, Eastern District of Wisconsin
U.S. District Court, Western District of Wisconsin
U.S. District Court, Northern District of Ohio

4(b). I attach a certificate of good standing for each of the jurisdictions listed in paragraph 4(a) above.

5. I have no office or other presence in Illinois for the practice of law.

6. I submit to the disciplinary authority of the Supreme Court of Illinois.

7. I have undertaken to become familiar with and to comply, as if admitted to practice in Illinois, with the rules of the Supreme Court of Illinois, including the Illinois Rules of Professional Conduct and the Supreme Court Rules on Admission and Discipline of Attorneys, and other Illinois law and practices that pertain to the proceeding.

8. The full name, business address and with whom I have associated with in the matter is:

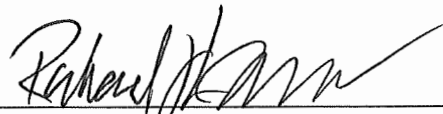
Jon Micah Goeller
Husch Blackwell LLP
120 S. Riverside Plaza, Suite 2200
Chicago, IL 60606
(312) 655-1500
(312) 655-1501

9. I certify that I have served this Statement upon Petitioner, Paul Christian Pratapas.

Verification

I verify the accuracy and completeness of each of the above statement.

HUSCH BLACKWELL LLP



Richard J. Lewandowski
Husch Blackwell LLP
33 East Main Street, Suite 300
Madison, WI 53703
(608) 255- 4440
richard.lewandowski@huschblackwell.com



Sheila T. Reiff
Clerk

Electronic Filing: Received, Clerk's Office 11/30/2022

WISCONSIN SUPREME COURT

OFFICE OF THE CLERK

110 E. Main Street, Suite 215
P.O. Box 1688
Madison, WI 53701-1688

Telephone: 608-266-1880
TTY: 800-947-3529
Fax: 608-267-0640
<http://www.wicourts.gov>

CERTIFICATE OF GOOD STANDING

I, Sheila T. Reiff, Clerk of the Supreme Court of Wisconsin certify that the records of this office show that:

RICHARD J. LEWANDOWSKI

was admitted to practice as an attorney within this state on June 16, 1978 and is presently in good standing in this court.

Dated: November 16, 2022

A handwritten signature in black ink, appearing to read "Sheila T. Reiff".

SHEILA T. REIFF
Clerk of Supreme Court

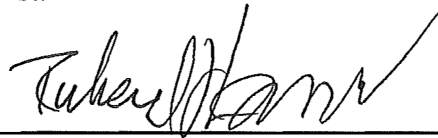


CERTIFICATE OF SERVICE

The undersigned certifies that true copies of the foregoing NOTICE OF FILING, REQUEST TO APPEAR PRO HAC VICE, and APPEARANCE were filed electronically on November 30, 2022 with the following:

Brad Halloran, Attorney, Hearing Officer
Illinois Pollution Control Board
60 E. Van Buren St. Suite 630
Chicago, IL 60605

And that true copies of the NOTICE OF FILING, REQUEST TO APPEAR PRO HAC VICE, and APPEARANCE were mailed by First Class Mail, postage prepaid, on November 30, 2022 on the parties listed on the foregoing Service List.



Richard J. Lewandowski, Attorney
Husch Blackwell LLP
33 East Main Street, Suite 300
Madison, WI 53703
(608) 255- 4440
richard.lewandowski@huschblackwell.com

PCB No. 2023-014 SERVICE LIST:

INTERESTED PARTY:

Illinois Pollution Control Board Division of
Don Brown- Clerk of the Board
100 W. Randolph St. Suite 11-500
Chicago, IL 60601
(312) 814-3620
don.brown@illinois.gov

COMPLAINANT:

Paul Christian Pratapas
330 E. Chicago Ave. #110
Naperville, IL 60540
paulpratapas@gmail.com