

**BEFORE THE POLLUTION CONTROL BOARD**

PROTECT WEST CHICAGO,	)	
	)	
Petitioner,	)	PCB 2023-107
	)	(Third-Party Pollution Control Facility
vs.	)	Siting Appeal)
	)	
CITY OF WEST CHICAGO, WEST	)	
CHICAGO CITY COUNCIL, and	)	
LAKESHORE RECYCLING SYSTEMS,	)	
LLC.,	)	
	)	
Respondents,	)	
-----	)	
	)	
PEOPLE OPPOSING DUPAGE	)	
ENVIRONMENTAL RACISM,	)	
	)	
Petitioner,	)	PCB 2023-109
	)	(Third-Party Pollution Control Facility
vs.	)	Siting Appeal)
	)	
CITY OF WEST CHICAGO, WEST	)	
CHICAGO CITY COUNCIL, and	)	
LAKESHORE RECYCLING SYSTEMS,	)	
LLC.,	)	
	)	
Respondents.	)	


**NOTICE OF FILING**

TO: See attached Service List

**PLEASE TAKE NOTICE** that on April 12, 2023, LAKESHORE RECYCLING SYSTEMS, LLC electronically filed with the Office of the Clerk of the Illinois Pollution Control Board their **Motion to Consolidate**, a copy of which is hereby served upon you.

Respectfully submitted,

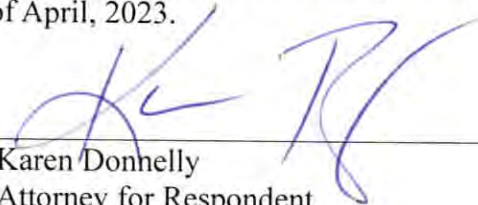
LAKESHORE RECYCLING SYSTEMS, LLC,  
Respondent

BY:   
Karen Donnelly  
One of Respondent's Attorneys

Karen Donnelly  
Karen Donnelly Law  
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**AFFIDAVIT OF SERVICE**

I, the undersigned, on oath state that I have served on this 12<sup>th</sup> day of April, 2023, the attached **Notice of Filing** and **Motion to Consolidate** on behalf of LAKESHORE RECYCLING SYSTEMS, LLC upon the following persons to be served via email transmittal from 501 State Street, Ottawa, Illinois 61350, this 12th day of April, 2023.

  
\_\_\_\_\_  
Karen Donnelly  
Attorney for Respondent

**SERVICE LIST**

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**MOTION TO CONSOLIDATE**

Now comes LAKESHORE RECYCLING SYSTEMS, LLC., by their attorneys, George Mueller and Karen Donnelly, and moves to consolidate the two cases captioned above, and in support thereof states as follows:

1. Both of the above cases arise out of the same local siting application, and both arise out of the same local hearing and decision. The respective Petitioners participated as objectors in the local siting hearings.

2. Petitioners in both cases raise substantially similar issues which are most efficiently dealt with by consolidated discovery and briefing.

3. No party will be prejudiced by consolidation of these two cases.

4. Consolidation will promote judicial efficiency and economy.

WHEREFORE, Respondent, LAKESHORE RECLCYING SYSTEMS, LLC., respectfully prays that Cases PCB 2023-107 and PCB 2023-109 be consolidated.

Respectfully submitted,

LAKESHORE RECYCLING SYSTEMS, LLC,  
Respondent

BY: /s/ George Mueller  
George Mueller  
One of Respondent's Attorneys

George Mueller  
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