

**BEFORE THE POLLUTION CONTROL BOARD**

PROTECT WEST CHICAGO,	)	
	)	
Petitioner,	)	PCB 2023-107
	)	(Pollution Control Facility Siting Appeal)
vs.	)	
	)	
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 and	)	
LAKESHORE RECYCLING SYSTEMS,	)	
LLC,	)	(Consolidated)
	)	
Respondents.	)	

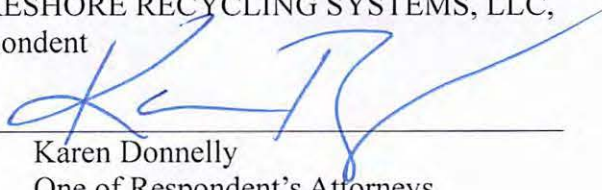
**NOTICE OF FILING**

TO: See attached Service List

**PLEASE TAKE NOTICE** that on September 21, 2023, LAKESHORE RECYCLING SYSTEMS, LLC electronically filed with the Office of the Clerk of the Illinois Pollution Control Board its **Objection to Exhibits**, 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 the attached **Notice of Filing and Respondent Lakeshore Recycling Systems, LLC's Objection to Exhibits**, 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 21<sup>st</sup> day of September, 2023.

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

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**LAKESHORE OBJECTION TO EXHIBITS**

Now comes Respondent, LAKESHORE RECYCLING SYSTEMS, LLC, by and through its attorneys, George Mueller and Karen Donnelly, and pursuant to agreement of the parties and Hearing Officer Halloran's Order of August 21, 2023, states and alleges as follows:

1. On August 21, 2023, all parties were present for a telephonic status hearing, at which time it was agreed, and ordered, that any objections to Exhibits not in the record are due to be filed by September 21, 2023.

2. LAKESHORE specifically objects to all Exhibits which PWC and PODER have indicated they intend to offer at the time of hearing herein.

3. The Exhibits which PWC and PODER intend to offer at the time of hearing are irrelevant, immaterial, and lack a proper foundation.

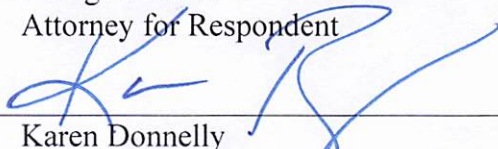
4. Many of the Exhibits are "new evidence" which were not made a part of the record below and are now being disclosed mere days before hearing, resulting in substantial prejudice to LAKESHORE.

WHEREFORE, LAKESHORE RECYCLING SYSTEMS, LLC requests that PWC and PODER be precluded from offering their proposed Exhibits into evidence at the time of hearing for the reasons recited hereinabove, and for such other and further relief as is just and equitable.

Respectfully submitted,

LAKESHORE RECYCLING SYSTEMS, LLC.,  
Respondent

BY: /s/ George Mueller  
George Mueller  
Attorney for Respondent

BY:   
Karen Donnelly  
Attorney for Respondent

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