

RECEIVED  
CLERK'S OFFICE

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD APR 22 2005

STATE OF ILLINOIS  
Pollution Control Board

PEOPLE OF THE STATE OF ILLINOIS, )  
LISA MADIGAN, Attorney General )  
of the State of Illinois, )  
 )  
Complainant, )  
 )  
vs. )  
 )  
MIDWEST GRAIN PRODUCTS OF )  
ILLINOIS, INC., an Illinois Corporation, )  
 )  
Respondent. )

PCB-1997-179  
(Enforcement – Air)

**NOTICE OF MOTION AND MOTION TO APPEAR *PRO HAC VICE*  
ON BEHALF OF MIDWEST GRAIN PRODUCTS OF ILLINOIS, INC.**

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

Pursuant to 35 Il. Admin, Code §101.400(3), Patrick M. Flachs of the law firm of  
Husch & Eppenberger, LLC, respectfully requests permission to appear *pro hac vice* as  
counsel for the Respondent, Midwest Grain Products of Illinois, Inc., in the captioned  
proceedings.

After being duly sworn on oath, Patrick M. Flachs offers the following in support  
of this motion:

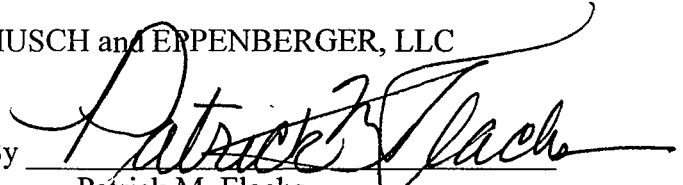
1. I am an attorney. I have been licensed to practice law in the State of  
Missouri since December 19, 1996 and the State of Texas since November 6, 1978.

2. I am a partner and practice in the Environmental & Regulatory Practices Group at Husch & Eppenberger, LLC.

Respectfully submitted,

HUSCH and EPPENBERGER, LLC

By



Patrick M. Flachs  
160 Carondelet Plaza, Ste. 600  
St. Louis, MO 63105  
(314) 480-1500  
(314) 480-1524 (direct dial)  
(314) 480-1505 (fax)  
[Patrick.flachs@husch.com](mailto:Patrick.flachs@husch.com)

Attorneys for Respondent  
Midwest Grain Products of Illinois,  
Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that I did on the 20<sup>th</sup> day of April, 2005, send a true and accurate copy of the foregoing instrument by first class mail, postage prepaid to Complainant's attorney:

Jane E. McBride  
Assistant Attorney General  
Environmental Bureau  
500 South Second Street  
Springfield, IL 62706

and the originals and ten copies of the foregoing instrument by first class mail, postage prepaid to:

Dorothy Gunn, Clerk  
Illinois Pollution Control Board  
State of Illinois Center  
Suite 11-500  
100 West Randolph  
Chicago, IL 60601

  
Attorney