

Electronic Filing: Received, Clerk's Office 10/25/2023

From: [Holloran, Brad](#)
To: [Brown, Don](#)
Cc: [Pauley, Daniel](#); [Holloran, Brad](#)
Subject: FW: [External] Re: Official Service: PCB 2023-014, Paul Christian Pratapas v. Horizon Construction Group, Inc.
Date: Wednesday, October 25, 2023 3:43:19 PM

Don- please docket.

From: Paul Pratapas <paulpratapas@gmail.com>
Sent: Wednesday, October 25, 2023 3:04 PM
To: Lewandowski, Richard <richard.lewandowski@huschblackwell.com>
Cc: Goeller, Jon Micah <jonmicah.goeller@huschblackwell.com>; Holloran, Brad <Brad.Holloran@illinois.gov>
Subject: [External] Re: Official Service: PCB 2023-014, Paul Christian Pratapas v. Horizon Construction Group, Inc.

You weren't concerned when I made a SWPPP request in front of the Head Engineer for Bolingbrook.

Weren't concerned when your client texted me refusing to provide access to public records.

Weren't concerned when your client repeatedly denied their permit responsibilities.

But I am sure you will make discovery requests and continue trying to weasel out of responsibility.

No concern for ILEPA when Billy said he didn't care what they thought the day before an inspection which resulted in a notice of noncompliance.

The quickest solution is to accept responsibility.

This case is not going away and the federal lawsuit is going to be filed for \$250,000,000 now as a result of continued denial of responsibility and weasel behavior. The amount will increase prior to filing as needed to protect American values.

Please elaborate on where and when your concern originated beyond being a scumbag lawyer?

Anything you need to say to me should be in writing and go through my legal department. The same thing the Horizon Pollution Group CEO said in response to a basic request protected by the constitution.

Respondent engaged in the most serious violations I've ever seen and continues to think they are the boss of the world. And now, this scumbag thinks he is going to weasel out of it using the same laws they refuse to comply with.

This is one picture of many taken by an expert, There is no defense. Only criminal penalties. The same applies to The Board if they continue acting biased towards criminals.



Electronic Filing: Received, Clerk's Office 10/25/2023



Kind Regards,

Paul Pratapas
630.696.2843

On Wed, Oct 25, 2023 at 2:35 PM Lewandowski, Richard <Richard.Lewandowski@huschblackwell.com> wrote:

Mr. Halloran, thank you for your email. We are concerned about a six week delay when very simple alternatives are available that will allow this matter to proceed tomorrow morning as scheduled:

- Mr. Pratapas found a way to email the Board, meaning that he found both internet access and the electricity needed to send the email;
- We can call his cell (which is battery operated) and you at the scheduled time; this does not require him to have electricity in his apartment;
- We understand that Mr. Pratapas moved to Memphis to work for a unit of local government. The call is scheduled during normal business hours. If he can't charge his phone at home, he should be able to do so at work, OR we could call him at his work number and join you to the call;
- To the best of our knowledge, Memphis is not experiencing a catastrophic power failure; any difficulties Mr. Pratapas may face are local and most likely of his own making.

We filed a comprehensive motion to dismiss, along with supporting materials, on June 21, 2023; we filed a reply brief in support of that motion on July 21, 2023. You probably noted that on October 24, we filed our brief in opposition to Mr. Pratapas' motion to amend the complaint yet again.

This matter has dragged on for a considerable amount of time. All work on the project was completed early last summer. Mr. Pratapas missed three prior status calls, did not respond to any of our discovery requests (including requests for admission), and failed to disclose any witnesses or identify any documents supporting his claims.

With all due respect, our client deserves to get this matter resolved and behind them. We ask that the call proceed tomorrow morning as scheduled.

Respectfully submitted,

Richard J. Lewandowski
Senior Counsel

HUSCH BLACKWELL LLP
33 East Main Street,
Suite 300
Madison, WI 53703-3095
Direct: 608-258-7388
Mobile: 608-886-3898
Fax: 608-258-7138
Richard.Lewandowski@huschblackwell.com
huschblackwell.com
[vBio|yCard](#)

Technology, Manufacturing & Transportation
Environmental

Husch Blackwell is a different kind of law firm—structured around our clients' industries and built on a culture of selfless service. Our 900+ lawyers collaborate across the U.S. from more than 20 offices and our virtual office, The Link, to provide uncommon solutions to our clients' most complex challenges.

From: Halloran, Brad <Brad.Halloran@illinois.gov>

Sent: Wednesday, October 25, 2023 1:54 PM

To: Goeller, Jon Micah <JonMicah.Goeller@huschblackwell.com>; Lewandowski, Richard <Richard.Lewandowski@huschblackwell.com>; Paul Pratapas <paulpratapas@gmail.com>

Cc: Halloran, Brad <Brad.Halloran@illinois.gov>

Subject: RE: Official Service: PCB 2023-014, Paul Christian Pratapas v. Horizen Construction Group, Inc.

[EXTERNAL EMAIL]

Counsel- Mr. Pratapas recently emailed our Clerk and said he has no electricity and will not be available for the status tomorrow. I suggest we reschedule the status to December 7, 2023, at 11:30 a.m. Thank you and let me know.

Electronic Filing: Received, Clerk's Office 10/25/2023

From: Mims, Barbara <Barbara.Mims@illinois.gov>
Sent: Monday, September 25, 2023 12:13 PM
To: jpmicah.goeller@huschblackwell.com; richard.lewandowski@huschblackwell.com; Paul Pratapas <paulpratapas@gmail.com>
Cc: Halloran, Brad <Brad.Halloran@illinois.gov>
Subject: Official Service: PCB 2023-014, Paul Christian Pratapas v. Horizon Construction Group, Inc.

By this e-mail, the Illinois Pollution Control Board serves you with the attached order of September 25, 2023.

State of Illinois - CONFIDENTIALITY NOTICE: The information contained in this communication is confidential, may be attorney-client privileged or attorney work product, may constitute inside information or internal deliberative staff communication, and is intended only for the use of the addressee. Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify the sender immediately by return e-mail and destroy this communication and all copies thereof, including all attachments. Receipt by an unintended recipient does not waive attorney-client privilege, attorney work product privilege, or any other exemption from disclosure.