

ILLINOIS POLLUTION CONTROL BOARD

November 16, 2006

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DEC 16 2006
STATE OF ILLINOIS
Pollution Control Board

ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,)
)
Complainant,)
) AC 05-40
NORTHERN ILLINOIS SERVICE) (IEPA No. 567-04-AC)
COMPANY,) (Administrative Citation)
)
Respondents.)

MOTION FOR STAY OF ENFORCEMENT OF ADMINISTRATIVE ORDER

TO: Michelle M. Ryan
Special Assistant Attorney General
Illinois Environmental Protection Agency
Division of Legal Counsel
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

Dorothy Gunn, Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph Street, Suite 11-500
Chicago, IL 60601

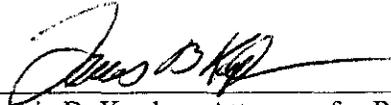
NOW COMES petitioner NORTHERN ILLINOIS SERVICE COMPANY by PETER DeBRUYNE, P.C. and Lewis B. Kaplan, its attorneys, and pursuant to Supreme Court Rule 335(g) moves that enforcement of the Order, a copy of which is attached hereto marked Exhibit "A" and made a part hereof, adopted by the Illinois Pollution Control Board on November 16, 2006 for payment by petitioner, NORTHERN ILLINOIS SERVICE COMPANY, of a Civil Penalty and costs in the total amount of \$3,406.50 no later than January 2, 2007 be stayed pending review of the aforesaid Order of November 16, 2006 by the Appellate Court of Illinois, Second Judicial District in its case No. 02-06-1237.

NORTHERN ILLINOIS SERVICE
COMPANY, Petitioner,

By PETER DeBRUYNE, P.C.

By

Peter DeDeBruyne, Attorney
for Petitioner

A handwritten signature in black ink, appearing to read "Lewis B. Kaplan", written over a horizontal line.

Lewis B. Kaplan, Attorney for Petitioner

Peter DeBruyne
Peter DeBruyne, P.C.
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Attorneys for Petitioner, NORTHERN ILLINOIS SERVICE COMPANY

AFFIDAVIT OF SERVICE

Peter DeBruyne on oath states: On the 13th day of December, 2006, I served this Motion by mailing a copy to each person to whom it is directed.



SUBSCRIBED and sworn to before me

this 13th day of December, 2006.


Notary Public

Peter DeBruyne
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