

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS)	
)	
Complainant,)	
)	
v.)	PCB 06-82
)	(Enforcement – Water)
BARGER ENGINEERING, INC.,)	
an Indiana corporation)	
)	
Respondent)	

MOTION TO WITHDRAW

NOW COMES Charles J. Northrup, an attorney for Respondent, and hereby moves to withdraw as counsel in this matter. In support, Movant states:

1. Charles J. Northrup and the law firm of Sorling, Northrup, Hanna, Cullen & Cochran, Ltd. have appeared in the above captioned matter as an attorney for Respondent.
2. Charles J. Northrup has accepted a legal position with a not-for-profit association and will no longer be engaged in the private practice of law. The scope of his duties at his new employer, as well as the terms of that new employment, will not allow him to devote any time or resources to continuing representation of private clients, including the Respondent in this matter.
3. Charles J. Northrup has advised Respondent of his intent to withdraw and has given notice of this action.
4. Charles J. Northrup has, consistent with Supreme Court of Illinois Rule of Professional Conduct 1.16(d) taken reasonable steps to avoid foreseeable prejudice to the Respondent including giving notice of this Motion.

5. All notices and official papers in this matter should be sent to:

Ms. Claire Manning
Brown, Hay & Stephens, LLP
205 S. 5th St.
P. O. Box 2459
Springfield, IL 62705-2459

WHEREFORE, Charles J. Northrup respectfully requests that this tribunal allow him to withdraw from this matter, and for any other relief this tribunal deems appropriate.

Respectfully submitted,


Charles J. Northrup

Mr. Charles J. Northrup
Illinois State Bar Association
424 S. 2nd St.
Springfield, IL 62701

Sorling, Northrup, Hanna,
Cullen & Cochran, Ltd.
Suite 800 Illinois Building
P.O. Box 5131
Springfield, IL 62705
Telephone: 217.544.1144
Fax: 217.522.3173

PROOF OF SERVICE

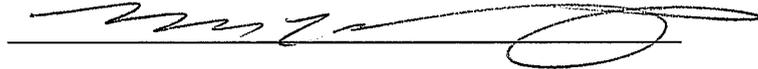
The undersigned hereby certifies that the foregoing Motion to Withdraw was filed electronically with the Clerk of the Illinois Pollution Control Board in Chicago, Illinois and copies of said document were served by U.S. Mail to the following addresses with postage fully pre-paid on the 8th day of October, 2008.

Ms. Carol Webb
Hearing Officer
Illinois Pollution Control Board
1021 N. Grand Ave. East
P. O. Box 19274
Springfield, IL 62794-9274

Ms. Claire A. Manning
Brown, Hay & Stephens, LLP
205 South Fifth St.
P. O. Box 2459
Springfield, IL 62705-2459

Ms. Kristen Laughridge Gale
Office of the Attorney General
Environmental Bureau
500 South Second St.
Springfield, IL 62706

Barger Engineering
c/o Matthew Stone
P. O. Box 2507
Evansville, IN 47728

A handwritten signature in black ink, appearing to be "Matthew Stone", written over a horizontal line.