

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)
)
 Complainant,)
)
 v.) PCB No. 16-72
) (Land - Enforcement)
 BUNGE NORTH AMERICA, INC.)
 A New York corporation,)
)
 Respondent.)

NOTICE OF FILING

TO: Mr. John Therriault
Clerk of the Board
Illinois Pollution Control Board
100 West Randolph Street
Suite 11-500
Chicago, Illinois 60601
(VIA ELECTRONIC MAIL)

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Illinois Pollution Control Board a **NOTICE OF FIRM NAME CHANGE, ENTRY OF APPEARANCE OF KATHERINE D. HODGE, and RESPONDENT'S RESPONSE TO COMPLAINANT'S MOTION FOR RELIEF FROM HEARING REQUIREMENT**, copies of which are herewith served upon you.

Respectfully submitted,

BUNGE NORTH AMERICA, INC.,
Respondent,

Dated: January 5, 2016

By: /s/ Katherine D. Hodge
One of Its Attorneys

Katherine D. Hodge
HEPLERBROOM, LLC
3150 Roland Avenue
Springfield, Illinois 62703
Katherine.Hodge@heplerbroom.com
(217) 523-4900

CERTIFICATE OF SERVICE

I, Katherine D. Hodge, the undersigned, certify that I have served the attached NOTICE OF FIRM NAME CHANGE, ENTRY OF APPEARANCE OF KATHERINE D. HODGE, and RESPONDENT'S RESPONSE TO COMPLAINANT'S MOTION FOR RELIEF FROM HEARING REQUIREMENT upon:

Mr. John Therriault
Clerk of the Board
Illinois Pollution Control Board
100 West Randolph Street
Suite 11-500
Chicago, Illinois 60601

via electronic mail on January 5, 2016; and upon:

David G. Samuels
Assistant Attorney General
Environmental Bureau
500 South Second Street
Springfield, Illinois 62706

by depositing said documents in the United States Mail in Springfield, Illinois, postage prepaid, on January 5, 2016.

/s/ Katherine D. Hodge

Katherine D. Hodge

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NOTICE OF FIRM NAME CHANGE

NOW COMES Katherine D. Hodge, of the law firm of HODGE DWYER & DRIVER and hereby notifies the Illinois Pollution Control Board of a change in firm name. Effective January 1, 2016, HODGE DWYER & DRIVER merged with HEPLERBROOM, LLC. Please note new contact information as set forth below.

Respectfully submitted,

HEPLERBROOM, LLC,

Dated: January 5, 2016

By: /s/ Katherine D. Hodge
One of Its Attorneys

Katherine D. Hodge
HEPLERBROOM, LLC
3150 Roland Avenue
Springfield, Illinois 62703
Katherine.Hodge@heplerbroom.com
(217) 523-4900

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ENTRY OF APPEARANCE OF KATHERINE D. HODGE

NOW COMES Katherine D. Hodge, of the law firm of HEPLERBROOM, LLC,
and hereby enters her appearance on behalf of BUNGE NORTH AMERICA, INC., in the
above-referenced matter.

Respectfully submitted,

BUNGE NORTH AMERICA, INC.,
Respondent,

By: /s/ Katherine D. Hodge
Katherine D. Hodge

Dated: January 5, 2016

Katherine D. Hodge
HEPLERBROOM, INC.
3150 Roland Avenue
Springfield, Illinois 62703
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**RESPONDENT'S RESPONSE TO COMPLAINANT'S
MOTION FOR RELIEF FROM HEARING REQUIREMENT**

NOW COMES Respondent, BUNGE NORTH AMERICA, INC. ("Bunge" or "Respondent"), a New York corporation, by and through its attorneys, HEPLERBROOM, LLC, and for its Response to Complainant's Motion for Relief from Hearing Requirement and pursuant to 35 Ill. Admin. Code § 101.500(d), states as follows:

1. On December 23, 2015, Complainant filed its Complaint, Stipulation and Proposal for Settlement executed by the Complainant and Respondent, and a Motion for Relief from Hearing Requirement.
2. Complainant has no objection to the Motion for Relief from Hearing Requirement.

WHEREFORE Respondent, BUNGE NORTH AMERICA, INC., for the above stated reason, respectfully prays that the Illinois Pollution Control Board grant Complainant's Motion For Relief from Hearing Requirement.

Respectfully submitted,

BUNGE NORTH AMERICA, INC.,
Respondent,

Dated: January 5, 2016

By: /s/ Katherine D. Hodge
One of Its Attorneys

Katherine D. Hodge
HEPLERBROOM, LLC
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Springfield, Illinois 62703
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