

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

In the Matter of:)	
)	
SIERRA CLUB, ENVIRONMENTAL)	
LAW AND POLICY CENTER,)	
PRAIRIE RIVERS NETWORK, and)	
CITIZENS AGAINST RUINING THE)	
ENVIRONMENT)	
)	PCB No-2013-015
Complainants,)	(Enforcement – Water)
)	
v.)	
)	
MIDWEST GENERATION, LLC,)	
)	
Respondents)	

NOTICE OF FILING

To: See attached Certificate of Service

PLEASE TAKE NOTICE that I have filed today with the Illinois Pollution Control Board the attached Verified Statement of Out-of-State Attorney Pursuant to Supreme Court Rule 707 and Notice of Appearance for Jennifer S. Duggan and Abel J. Russ, all of which are herewith served upon you.

Respectfully Submitted,



DATED: September 18, 2014

Jennifer S. Duggan
Attorney
Environmental Integrity Project
1000 Vermont Ave NW, Suite 1100
Washington, DC 20005
jduggan@environmentalintegrity.org
(802) 225-6774

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PRAIRIE RIVERS NETWORK, and)	
CITIZENS AGAINST RUINING THE)	
ENVIRONMENT)	
)	
Complainants,)	
)	
v.)	PCB No-2013-015
)	(Enforcement – Water)
MIDWEST GENERATION, LLC,)	
)	
Respondents)	

APPEARANCE

The undersigned hereby enters her appearance on behalf of the Sierra Club.

Respectfully Submitted,



DATED: September 18, 2014

Jennifer S. Duggan
Attorney
Environmental Integrity Project
1000 Vermont Ave NW, Suite 1100
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Complainants,) PCB No-2013-015
) (Enforcement – Water)
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v.)
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MIDWEST GENERATION, LLC,)
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Respondents)

Verified Statement of Out-of-State Attorney Pursuant to Supreme Court Rule 707

I, Jennifer Suzanne Duggan, submit this Verified Statement pursuant to Illinois Supreme Court Rule 707.

1. My full name is Jennifer Suzanne Duggan. The address of offices from which I practice law and related email address and telephone numbers are as follows:

Environmental Integrity Project
1000 Vermont Avenue NW, Suite 1100
Washington, DC 20003
jduggan@environmentalintegrity.org
(802) 225-6774

2. I represent the Sierra Club in Sierra Club et al. v. Midwest Generation, LLC, before the Illinois Pollution Control Board (PCB No-2103-015).

3(a). I have not filed any other appearance pursuant to this rule during this calendar year.

3(b). I have not received a registration number from the ARDC.

4(a). I list each jurisdiction of admission, including any state, territory, or commonwealth of the United States, the District of Columbia, or in a foreign country, and my full admission name and license number:

- District of Columbia (Bar No. 978352)
- California, Inactive (Bar No. 254642)

4(b). I attach a letter or certificate of good standing for each of the jurisdictions listed in paragraph 4(a) above.

5. I have no office or other presence in Illinois for the practice of law.

6. I submit to the disciplinary authority of the Supreme Court of Illinois;

7. I have undertaken to become familiar with and to comply, as if admitted to practice in Illinois, with the rules of the Supreme Court of Illinois, including the Illinois Rules of Professional Conduct and the Supreme Court Rules on Admission and Discipline of Attorneys, and other Illinois law and practices that pertain to the proceeding;

8. The full name, business address and ARDC number of the Illinois attorney with whom I have associated in the matter is:


Jennifer L. Cassel
ARDC number: 6296047
Environmental Law & Policy Center
35 E. Wacker Dr., Suite 1600
Chicago, IL 60601
jcassel@elpc.org
(312) 795-3726

9. I certify that I have served this Statement upon CT Corporation Systems (for Midwest Generation, LLC), Faith E. Bugel and Jennifer L. Cassel (Environmental Law and Policy Center), Keith Harley (Chicago Legal Clinic, Inc.), and Jennifer T. Nijman (Nijman Franzetti LLP), and that these parties are all entitled to service under this rule.

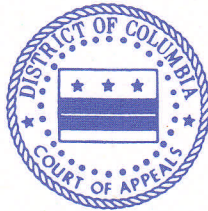
10. I certify that I have served this Statement on the Attorney Registration & Disciplinary Commission of the Supreme Court of Illinois via Rule707@iadc.org.

Verification

I verify the accuracy and completeness of each of the above statements.



Jennifer Duggan



District of Columbia Court of Appeals
Committee on Admissions
430 F Street, N.W. — Room 123
Washington, D. C. 20001
202/879-2710

I, JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals, do hereby certify that

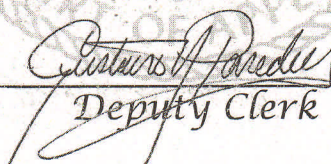
JENNIFER SUZANNE DUGGAN

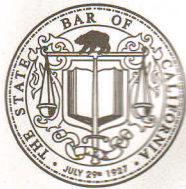
was on **MAY 1, 2009** duly qualified and admitted as an attorney and counselor entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on August 4, 2014

JULIO A. CASTILLO
Clerk of the Court

By:


Deputy Clerk



CERTIFICATE OF STANDING

August 26, 2014

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, JENNIFER SUZANNE PETERSON, #254642 was admitted to the practice of law in this state by the Supreme Court of California on December 21, 2007; that at her request, on June 18, 2013, her name was changed to JENNIFER SUZANNE DUGGAN on the records of the State Bar of California; that from the date of admission to January 31, 2013, she was an ACTIVE member of the State Bar of California; that on January 31, 2013, she transferred at her request to the INACTIVE status; that she has been since that date, and is at date hereof, an INACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Trustees or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Kathan Lambert

Custodian of Membership Records

NOTE: *Only ACTIVE members of the State Bar of California are entitled to practice law in California. (See Sections 6006 and 6125, et seq., Business and Professions Code.)*

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Respondents)	

APPEARANCE

The undersigned hereby enters his appearance on behalf of the Sierra Club.

Respectfully Submitted,



DATED: September 18, 2014

Abel J. Russ
Attorney
Environmental Integrity Project
1000 Vermont Ave NW, Suite 1100
Washington, DC 20005
aruss@environmentalintegrity.org
(202) 263-4453

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v.)
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MIDWEST GENERATION, LLC,)
)
Respondents)

Verified Statement of Out-of-State Attorney Pursuant to Supreme Court Rule 707

I, Abel J. Russ, submit this Verified Statement pursuant to Illinois Supreme Court Rule 707.

1. My full name is Abel James Russ. The address of offices from which I practice law and related email address and telephone numbers are as follows:

Environmental Integrity Project
1000 Vermont Avenue NW, Suite 1100
Washington, DC 20003
aruss@environmentalintegrity.org
(202) 263-4453

2. I represent the Sierra Club in Sierra Club et al. v. Midwest Generation, LLC, before the Illinois Pollution Control Board (PCB No-2103-015).

3(a). I have not filed any other appearance pursuant to this rule during this calendar year.

3(b). I have not received a registration number from the ARDC.

4(a). I list each jurisdiction of admission, including any state, territory, or commonwealth of the United States, the District of Columbia, or in a foreign country, and my full admission name and license number:

- Vermont (Abel J. Russ, License No. 4778)
- District of Columbia (Abel J. Russ, Bar No. 1007020)

4(b). I attach a letter or certificate of good standing for each of the jurisdictions listed in paragraph 4(a) above.

5. I have no office or other presence in Illinois for the practice of law.

6. I submit to the disciplinary authority of the Supreme Court of Illinois;

7. I have undertaken to become familiar with and to comply, as if admitted to practice in Illinois, with the rules of the Supreme Court of Illinois, including the Illinois Rules of Professional Conduct and the Supreme Court Rules on Admission and Discipline of Attorneys, and other Illinois law and practices that pertain to the proceeding;

8. The full name, business address and ARDC number of the Illinois attorney with whom I have associated in the matter is:

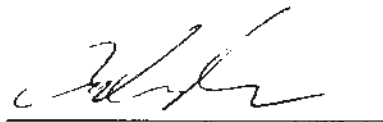
Jennifer L. Cassel
ARDC number: 6296047
Environmental Law & Policy Center
35 E. Wacker Dr., Suite 1600
Chicago, IL 60601
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10. I certify that I have served this Statement on the Attorney Registration & Disciplinary Commission of the Supreme Court of Illinois via Rule707@iadc.org.

Verification

I verify the accuracy and completeness of each of the above statements.



Abel J. Russ

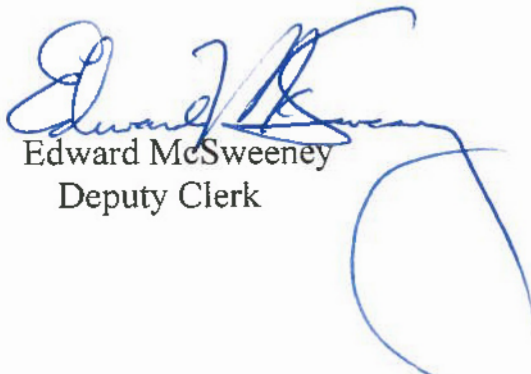


VERMONT SUPREME COURT
CERTIFICATE OF ADMISSION AND GOOD STANDING

This is to **CERTIFY** that **Abel Russ, #4778** was duly licensed and admitted to practice as an Attorney and Counselor at Law in all the courts of the State by the Vermont Supreme Court on the 7th day of December, 2010.

This is to **FURTHER CERTIFY** that the said **Abel Russ, Esq.** is on active status and is in good standing according to the records of this Court.

Dated at Montpelier, Vermont, this 18th day of August, 2014.



Edward McSweeney
Deputy Clerk





District of Columbia Court of Appeals
Committee on Admissions
430 F Street, N.W. — Room 123
Washington, D. C. 20001
202 / 879-2710

I, JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals, do hereby certify that

ABEL JAMES RUSS

was on the 9TH day of APRIL, 2012

duly qualified and admitted as an attorney and counselor entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on October 29, 2012.

JULIO A. CASTILLO
Clerk of the Court

By: Brandis Hancock
Deputy Clerk

Certificate of Service

The undersigned certifies that true copies of the foregoing Notice of Filing, Verified Statement of Out-of-State Attorney Pursuant to Supreme Court Rule 707, and Notice of Appearance were filed electronically on September 18, 2014 with the following:

John Therriault, Assistant Clerk
Illinois Pollution Control Board
100 West Randolph St
Suite 11-500
Chicago, IL 60601

And that true copies of the Notice of Filing, Verified Statement of Out-of-State Attorney Pursuant to Supreme Court Rule 707, and Notice of Appearance were mailed by First Class Mail, postage prepaid, on September 18, 2014 on the parties listed on the foregoing Service List.

/s/ Robert M. Gelles
Robert M. Gelles
Legal Assistant
Environmental Law & Policy Center
35 E Wacker Drive. Suite 1600
Chicago, Illinois 60601
312-795-3718

PCB 2013-015 SERVICE LIST:

Jennifer T. Nijman
NIJMAN FRANZETTI LLP
10 South LaSalle Street, Suite 3600
Chicago, IL 60603

Bradley P. Halloran, Hearing Officer
Illinois Pollution Control Board
100 West Randolph St
Suite 11-500
Chicago, IL 60601

CT Corporation Systems
Midwest Generation, LLC
208 South LaSalle Street Suite 814
Chicago, IL 60604