

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

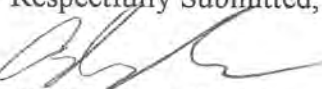
In the Matter of:)	
)	
SIERRA CLUB, ENVIRONMENTAL)	
LAW AND POLICY CENTER,)	
PRAIRIE RIVERS NETWORK, and)	
CITIZENS AGAINST RUINING THE)	
ENVIRONMENT)	
)	PCB N0-2013-015
Complainants,)	(Enforcement – Water)
)	
v.)	
)	
MIDWEST GENERATION, LLC,)	
)	
Respondents)	

NOTICE OF FILING

To:	John Therriault, Clerk	Bradley P. Halloran, Hearing Officer
	Illinois Pollution Control Board	Illinois Pollution Control Board
	James R. Thompson Center	James R. Thompson Center
	100 West Randolph Street, Suite 11-500	100 West Randolph Street, Suite 11-500
	Chicago, IL 60601	Chicago, IL 60601

Persons included on the attached
SERVICE LIST

PLEASE TAKE NOTICE that I have today filed 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 Abel J. Russ, all of which are herewith served upon you.

Respectfully Submitted,


Abel Russ, Attorney
Environmental Integrity Project
1000 Vermont Ave NW, Suite 1100
Washington, DC 20005
aruss@environmentalintegrity.org
(802) 662-7800

Dated: June 19, 2015

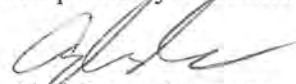
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Complainants,)	PCB NO-2013-015
)	(Enforcement – Water)
v.)	
)	
MIDWEST GENERATION, LLC,)	
)	
Respondents)	

NOTICE OF APPEARANCE

The undersigned hereby enters his appearance on behalf of Prairie Rivers Network.

Respectfully Submitted,



Abel Russ, Attorney
Environmental Integrity Project
1000 Vermont Ave NW, Suite 1100
Washington, DC 20005
aruss@environmentalintegrity.org
(802) 662-7800

Dated: June 19, 2015

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)	
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 20005
aruss@environmentalintegrity.org
(202) 263-4453

2. I represent Prairie Rivers Network in Sierra Club et al. v. Midwest Generation, LLC, before the Illinois Pollution Control Board (PCB No-2103-015). On September 17, 2014, I registered as counsel for the Sierra Club in this same matter; I no longer represent the Sierra Club in this matter.

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

3(b). My registration number is 6316366.

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
JCassel@elpc.org
(312) 795-3726

9. I certify that I have served this Statement upon CT Corporation Systems (for Midwest Generation, LLC), 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.

Verification

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





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 ***APRIL 9, 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 **June 15, 2015**.*

JULIO A. CASTILLO
Clerk of the Court

By: 
Deputy Clerk



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.

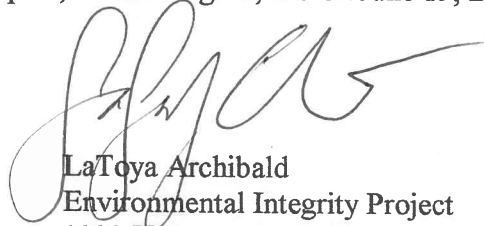
A handwritten signature in blue ink, appearing to read "Edward J. McSweeney", is written over the typed name and title.

Edward McSweeney
Deputy Clerk



CERTIFICATE OF SERVICE

I, *LaToya Archibald*, hereby certify that a true copy of the foregoing verified statement of out-of-state attorney pursuant to Supreme Court Rule 707 and NOTICE OF APPEARANCE were served via United States Mail, postage prepaid, in Washington, DC on June 19, 2015 upon the service list below.



LaToya Archibald
Environmental Integrity Project
1000 Vermont Ave. NW, Suite 1100
Washington, DC 20005
larchibald@environmentalintegrity.org
(202) 263-4443

Dated: June 19, 2015

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

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

Bradley P. Halloran, Hearing Officer
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph Street, Suite 11-500
Chicago, IL 60601