

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

ORIGINAL

THE CITY OF CHICAGO, a municipal)
corporation,)
)
) Petitioner,)
)
) v.)
) THE BURLINGTON NORTHERN AND SANTA FE)
) RAILWAY COMPANY,)
) Respondent.)

Case No. T02-0111

Petition for authorization to reconstruct the South)
Canal Street Viaduct over the tracks of the)
Burlington Northern Santa Fe Railway in the)
City of Chicago, County of Cook and State of)
Illinois, and for a waiver of the clearance)
requirements of 92 Ill. Admin. Code. Section 1500.)

RECEIVED

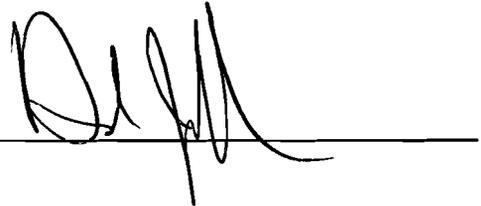
JUN 26 2007

Illinois Commerce Commission
RAIL SAFETY SECTION

MOTION FOR LEAVE TO SUBSTITUTE COUNSEL

Now come Daley & Mohan, P.C., attorneys at law, and represent to the Illinois Commerce Commission that they have been requested by Respondent BNSF Railway Company, formerly known as The Burlington Northern and Santa Fe Railway Company, to appear in this cause in its behalf effective July 1, 2007, and in the place of and instead of Kenneth J. Wysoglad & Associates, attorneys who have heretofore appeared for Respondent, and move for an order of Illinois Commerce Commission allowing Daley & Mohan, P.C. to enter their appearance in place of and as substitutes for Kenneth J. Wysoglad & Associates in accordance with the attached substitution of attorneys.

By: _____



DALEY & MOHAN, P.C.
150 N. Wacker Drive
Suite 1550
Chicago, IL 60606
(312) 422-9999

DOCKETED

JUN 27 2007

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

**THE CITY OF CHICAGO, a municipal
corporation,**)
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) **Petitioner,**)
) **v.**)
) **THE BURLINGTON NORTHERN AND SANTA FE**)
) **RAILWAY COMPANY,**)
) **Respondent.**)

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Burlington Northern Santa Fe Railway in the
City of Chicago, County of Cook and State of
Illinois, and for a waiver of the clearance
requirements of 92 Ill. Admin. Code. Section 1500.**)

SUBSTITUTION OF ATTORNEYS

Kenneth J. Wysoglad & Associates hereby withdraw our appearance for respondent BNSF Railway Company, formerly known as The Burlington Northern and Santa Fe Railway Company in the above-entitled cause.

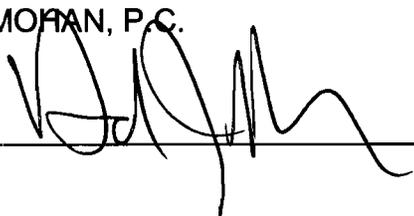
KENNETH J. WYSOGLAD & ASSOCIATES



Michael L. Sazdaroff

Daley & Mohan, P.C. hereby enter our appearance for the respondent, BNSF Railway Company, a corporation, formerly known as The Burlington Northern and Santa Fe Railway Company in the above-entitled cause.

DALEY & MOHAN, P.C.

By: 

Daley & Mohan, P.C.
150 N. Wacker Drive, Suite 1550
Chicago, IL 60606
(312) 422-9999

PROOF OF SERVICE

Robert J. Prendergast, being first duly sworn on oath, deposes and says that on the 20 day of JUNE, 2007, he caused to be served, a true and correct

copy of **MOTION FOR LEAVE TO SUBSTITUTE COUNSEL** upon:

Mr. Jack A. Pace
Assistant Corporation Counsel
Regulatory and Aviation Litigation
30 N. LaSalle Street, Suite 900
Chicago, IL 60602

Ms. Diana G. Collins
160 N. LaSalle Street
Suite C-800
Chicago, IL 60601

Mr. Henry Humphries
Railroad Section
Illinois Commerce Commission
527 E. Capitol Avenue
Springfield, IL 62701

by depositing same in the U.S. Mail depository located at Chicago, Illinois in an envelope(s) with first-class postage, prepaid.