

NOV 13 2018

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

DIVISION

In re the matter of:

Rendered Services, Inc.,
Respondent.

74 RTV-R Sub 15
81440 MC

Application for renewal of a Commercial Relocator's License pursuant to Section 401 of the Illinois Commercial Relocation of Trespassing Vehicles Law, 625 ILCS 5/18a-401

NOTICE OF FILING

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Latrice Kirkland-Montaque
Chief Administrative Law Judge
Illinois Commerce Commission
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PLEASE TAKE NOTICE that on November 7, 2018, I caused to be filed with the Director of Processing, Transportation Division, Illinois Commerce Commission, 527 East Capitol Avenue, Springfield, Illinois 62701, **ANSWER TO PETITION FOR LEAVE TO INTERVENE**, a copy of which is hereby served upon you.

CERTIFICATE OF SERVICE

I hereby certify under penalties of perjury as provided by law pursuant to Section 1-109 of the Illinois Code of Civil Procedure that a copy of the attached **ANSWER TO PETITION FOR LEAVE TO INTERVENE** was sent via electronic mail to the above listed persons on November 7, 2018.



Martin W. Burzawa

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ANSWER TO PETITION FOR LEAVE TO INTERVENE

NOW COMES the Staff of the Illinois Commerce Commission ("Staff"), by and through its attorney, Martin W. Burzawa, pursuant to 83 Ill. Adm. Code 200.180(d), and for its Answer to Petition for Leave to Intervene states:

1. On October 23, 2018, Intervenor, Protective Parking Service Corporation d/b/a Lincoln Towing Service ("Lincoln"), 92 RTV-R, filed its Petition for Leave to Intervene in the instant proceeding.

2. The Illinois Commercial Relocation of Trespassing Vehicles Law ("ICRVTL") provides that "[u]pon the filing of [a relocators license] application, the Commission shall, within a reasonable time, fix a time and place for public hearing thereon. At least 10 days before the hearing, the Commission shall notify the applicant and all parties of record to such proceeding of the time and place of such hearing, by mailing a notice thereof to each such party to the address of such party shown in the records of such proceeding. Any person having an interest in the subject matter may appear at the hearing in support of or in objection to the application." 625 ILCS 5/18a-400(b).

3. Section 18a-400 applies only to "original determinations" on applications for relocators's licenses. 625 ILCS 5/18a-400.

4. The proceeding before the Commission is an application for a renewal of a relocators's license governed by Section 18a-401 and not an original determination. 625 ILCS 5/18a-401.

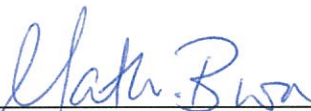
5. Additionally, Rule 200.200(e) provides that "[e]xcept for good cause shown, an intervenor shall accept the status of the record as the same exists at the time of the beginning of that person's intervention." 83 Ill. Admin. Code 200.200(e). The procedural posture of the instant proceeding renders the Petition to Intervene moot.

6. Accordingly, the Petition for Leave to Intervene should be denied.

WHEREFORE, Staff respectfully requests that the Administrative Law Judge deny the Petition for Leave to Intervene.

Respectfully submitted,

Staff of the Illinois Commerce Commission

By: 

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