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November 6, 2018

Via First Class Mail

Director of Processing
Illinois Commerce Commission
Transportation Division
527 East Capitol Avenue
Springfield, IL 62701

Re: Rendered Services, Inc., 74 RTV-R Sub 15

To Whom It May Concern:

Enclosed please find an original and three (3) copies of ***Respondent Rendered Services, Inc.'s Response to Protective Parking Service Corporation d/b/a Lincoln Towing Service's Petition for Leave to Intervene***, which we are hereby filing with your office.

Please do not hesitate to contact me if you have any questions.

Very truly yours,


Donald S. Rothschild

Enclosures

cc: The Honorable Latrice Kirkland-Montaque
Martin Burzawa, Esq.
Allen R. Perl, Esq.

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

TRANSPORTATION

NOV 08 2018

DIVISION

Rendered Services, Inc.,)
an Illinois corporation,)
Respondent.) 74 RTV-R Sub 15
Hearing on fitness to hold a Commercial) 81440 MC
Vehicle Relocator's License pursuant to)
Section 401 of the Illinois Commercial)
Relocation of Trespassing Vehicles Law, 625)
ILCS 5/18a-401)

NOTICE OF FILING

To: Via First Class Mail
Illinois Commerce Commission
Director of Processing
Transportation Division
527 East Capitol Avenue
Springfield, IL 62701

Via Electronic Mail
Allen R. Perl (aperl@perlandgoodsnyder.com)
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Chicago, Illinois 60607

Via Electronic Mail
The Honorable Latrice Kirkland-Montague
Administrative Law Judge
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701

Via Electronic Mail
Martin Burzawa (martin.burzawa@illinois.gov)
Special Assistant Attorney General
Illinois Commerce Commission
160 N. LaSalle Street, Suite C-800
Chicago, IL 60601

PLEASE TAKE NOTICE that on the 6th day of November, 2018, I caused to be filed with the Illinois Commerce Commission copies of the following document which is attached and served upon you:

***RESPONDENT RENDERED SERVICES, INC.'S RESPONSE TO
PROTECTIVE PARKING SERVICE CORPORATION, d/b/a LINCOLN TOWING
SERVICE'S PETITION FOR LEAVE TO INTERVENE***

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that he caused copies of the aforementioned document to be served upon all parties listed of record via electronic mail and by placing same in a postage prepaid envelope and depositing in the U.S. Mail at Burr Ridge, Illinois on this 6th day of November, 2018 before 5:00 p.m.



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**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

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625 ILCS 5/18a-401)	

**RENDERED SERVICES, INC.'S RESPONSE TO PROTECTIVE PARKING
SERVICE CORPORATION, d/b/a LINCOLN TOWING SERVICE'S
PETITION FOR LEAVE TO INTERVENE**

Respondent, RENDERED SERVICES, INC. ("Rendered"), by its attorneys, Goldstine, Skrodzki, Russian, Nemecek and Hoff, Ltd., pursuant to 83 Ill. Adm. Code § 200.200, hereby submits its RESPONSE TO PROTECTIVE PARKING SERVICE CORPORATION, D/B/A LINCOLN TOWING SERVICE'S PETITION FOR LEAVE TO INTERVENE, stating as follows:

1. In March 2016, the Illinois Commerce Commission ("ICC") filed its notice that it was initiating a fitness hearing on Rendered.
2. Contrary to Intervenor's allegations, the ICC did not *deny* Rendered's relocators' license renewal application, which still remains pending (Petition for Leave to Intervene, ¶ 4). Thus, Rendered continues to lawfully operate as a relocater. 92 Ill. Adm. Code § 1710.35(b).
3. After litigating this matter over several years, including conducting discovery, Rendered and ICC Transportation Counsel have reached a tentative agreement fully resolving ICC's fitness inquiry. Rendered's and Transportation Counsel's efforts have been ongoing for a number of months prior to arriving at a final resolution while the presiding Chief Administrative

Law Judge has been generally apprised of this process and the parties' progress.

4. Allowing Intervenor to intervene is within the discretion of the Chief Administrative Law Judge and furthermore, Intervenor must accept the status of the record at the time of any intervention. 83 Ill. Adm. Code § 200.200(e). The law favors the resolution of disputes as opposed to protracted litigation. Since Rendered and Transportation Counsel have reached agreeable settlement terms on the fitness inquiry, there is no basis to upset or delay the parties' settlement and continue litigating this matter. The Petition for Leave to Intervene should properly be denied.

WHEREFORE, Respondent, RENDERED SERVICES, INC., respectfully requests that the Chief Administrative Law Judge deny PROTECTIVE PARKING SERVICE CORPORATION, D/B/A LINCOLN TOWING SERVICE'S PETITION FOR LEAVE TO INTERVENE and award all other relief deemed equitable and just.

Respectfully submitted,

RENDERED SERVICES, INC.

By: 
One of Its Attorneys

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