

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)	
)	
Complainant,)	
)	
v.)	PCB 20-16
)	(Enforcement – Land)
)	
IRONHUSTLER EXCAVATING, INC., an)	
Illinois corporation, RIVER CITY)	
CONSTRUCTION, LLC, an Illinois limited)	
liability company, and VENOVICH)	
CONSTRUCTION CO., an Illinois corporation,)	
)	
Respondents.)	

NOTICE OF FILING

To: See Attached Service List.

PLEASE TAKE NOTICE that I have today electronically filed with the Office of the Clerk of the Pollution Control Board Notice of Filing and Notice of Service of Discovery Documents, a copy of which is herewith served upon you.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS
KWAME RAOUL, Attorney General
of the State of Illinois

MATTHEW J. DUNN, Chief
Environmental Enforcement/Asbestos
Litigation Division

BY: /s/Raymond J. Callery
 RAYMOND J. CALLERY
 Assistant Attorney General
 Environmental Bureau
 500 South Second Street
 Springfield, IL 62701
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rcallery@atg.state.il.us
ebs@atg.state.il.us

Dated: September 16, 2020

Service List:

Jay H. Scholl
DAVIS & CAMPBELL L.L.C.
401 Main Street, Suite 1600
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*Attorney for Ironhustler
Excavating, Inc.*

Mark A. Warner
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*Attorney for River City
Construction, LLC*

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NOTICE OF SERVICE OF DISCOVERY DOCUMENTS

To: See attached service list.

PLEASE TAKE NOTICE that I did on September 16, 2020, serve on the Respondents the following:

- Complainant’s Answers to River City’s Rule 213(f) Interrogatories
- Answers to River City’s Interrogatories to Complainant
- Complainant’s Answers to IronHustler’s Rule 213(f) Interrogatories
- Answers to IronHustler’s First Set of Interrogatories Directed to Complainant
- Response to IronHustler’s Request to Produce Directed to Complainant
- Response to River City’s Request to Produce Directed to Complainant

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS,
KWAME RAOUL, Attorney General of the
State of Illinois

MATTHEW J. DUNN, CHIEF
Environmental Enforcement/Asbestos
Litigation Division

By: /s/Raymond J. Callery
Raymond J. Callery
Assistant Attorney General
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500 South Second Street
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ebs@atg.state.il.us

Dated: September 16, 2020

CERTIFICATE OF SERVICE

I, hereby certify that I have this date, September 16, 2020, served the attached Notice of

Filing and Notice of Service of Discovery Documents by e-mail to:

Jay H. Scholl
DAVIS & CAMPBELL L.L.C.
401 Main Street, Suite 1600
Peoria, IL 61602
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*Attorney for Ironhustler
Excavating, Inc.*

Mark A. Warner
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Peoria, IL 61602
mwarner@quinnjohnston.com
*Attorney for River City
Construction, LLC*

BY: /s/Lilia M. Brown
Lilia M. Brown
Administrative Clerk
Environmental Bureau