

BEFORE THE Illinois Pollution Control Board

ANNA ANDRUSHKO

Complainant,

v.

THOMAS EGAN

Respondent.

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PCB 23-133

NOTICE OF FILING

TO: Illinois Pollution Control Board
60 E. Van Buren St., Suite 630
Chicago, IL 60605

TO: Anna Andrushko
9313 S. Spaulding Avenue
Evergreen Park, IL 60805

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Pollution Control Board Thomas Egan's Answer to Complainant's Request for Production, a copy of which is herewith served upon you.

Respectfully Submitted,

WALSH, FEWKES & STERBA

By: 

WALSH, FEWKES & STERBA
David A. Fewkes
7270 W. College Drive, Suite 101
Palos Heights, IL 60463
(708) 448-3401 (ph)
(708) 448-8022(fax)
Attorney No. 56616
Dfewkes@wfstriallaw.com

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

ANNA ANDRUSHKO)
)
Complainant)
) PCB 23 – 133
 v.)
)
THOMAS EGAN)
)
Respondent)

RESPONDENT'S ANSWER TO COMPLAINANT'S REQUEST FOR PRODUCTION

NOW COMES the Respondent, Thomas Egan, by and through his attorneys, Walsh, Fewkes & Sterba, P.C. and answers the Complainant's Request for Production.

1. Produce all documents about the acquisition and origin of the dog and that includes all ownership papers and should include: (a) Breed of the dog; (b) size of the dog; (c) weight; (d) acquisition date of dog; (e) facility/shelter or where did you acquire the dog; (f) medical history and; (g) age of the dog.

ANSWER: Irrelevant and will not lead to relevant information.

2. Identify any and all witnesses you intend to call, mention, and/or introduce at the hearing.
 - a. Experts name(s);
 - b. His/her area expertise, factual basis for each such opinion;
 - c. Address(es);
 - d. Amount of compensation paid to each such expert (receipts).

ANSWER: Assuming this question applies to expert witnesses, they are unknown at this time. Respondent reserves the right to name prior to trial. Investigation continues.

3. Identify any and all documents, reports, and audio and/or video recordings, and identify with specificity each document you intend to introduce as an exhibit or to offer into evidence at trial, but not limited to, pictures, photographs, visual recorded images, and audio recordings.

ANSWER: Respondent does not know at this time what documents, reports, and audio and/or video recordings, etc. he intends to introduce at trial. Investigation continues.

4. Provide Respondent's plat of survey of the property located at 9311 S. Spaulding Avenue, Evergreen Park, IL 60805.

ANSWER: Objection. Irrelevant and will not lead to relevant information.

5. Produce complete photos of your back yard and views (north, south, east and west), including fence, lawn, back of house, deck, including garage views and along boundary lot perimeter along adjoining lot where the Complainant's lot is located. Include photos taken from the Respondent's deck and at ground levels. Identify with specificity each document.

ANSWER: Objection. Irrelevant and will not lead to relevant information.


6. Provide documentation to support your steps you have taken to avoid or reduce the noise nuisance. List any and all equipment or products (toys, raw bones, chew ropes, landscape materials), services provided to (training), including various receipts (not limited to last 60 days), that includes dates, names, names of businesses, contact numbers, and cost.

ANSWER: Objection. Irrelevant and will not lead to relevant information.

7. Produce and identify with specificity all documents considered or used in providing your Answers to the Complainant's Interrogatories delivered simultaneously with this Request to Produce.

ANSWER: Objection. Irrelevant and will not lead to relevant information.

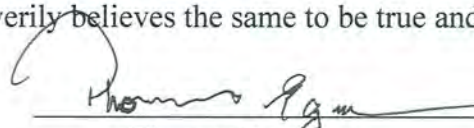
Respectfully Submitted,

By: 
One of the attorneys for Respondent

WALSH FEWKES & STERBA
Attorney for Respondent
7270 W. College Drive, Ste. 101
Palos Heights, IL 60463
Attorney No. 56616
(708) 448-3401
Dfewkes@wfstriallaw.com

CERTIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in the instrument are true and correct, except as to matters therein stated to be on information and belief, and as to matters the undersigned certifies as aforesaid that he verily believes the same to be true and correct.



Thomas Egan