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CLERK'S OFFICE

NOV 2 4 2003

OFFICE OF THE ATTORNEY GENERAL Pollution Control Board STATE OF ILLINOIS

Lisa Madigan

November 20, 2003

The Honorable Dorothy Gunn Illinois Pollution Control Board James R. Thompson Center 100 West Randolph, Suite 11-500 Chicago, Illinois 60601

Re:

People v. Michel Grain Company, Inc.

PCB No. 96-143

Dear Clerk Gunn:

Enclosed for filing please find the original and five copies of a NOTICE OF FILING and NOTICES OF DISCOVERY DEPOSITIONS FOR CHRIS MICHEL, BRUCE ELLIS, MIKE BEAN, MARSHA BEAN and JEFF MOORE, in regard to the above-captioned matter. Please file the originals and return file-stamped copies of the documents to our office in the enclosed, self-addressed, stamped envelope.

Thank you for your cooperation and consideration.

Phillip Mi Quella

Phillip McQuillan Environmental Bureau 500 South Second Street Springfield, Illinois 62706

(217) 782-9031

PM/pp Enclosures

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PEOPLE OF THE STATE OF ILLINOIS,)	NOV 2 4 2003
Complainant,)	STATE OF ILLINOIS Pollution Control Board
vs.) PCB 96-143) (Enforcement-Water)	
MICHEL GRAIN COMPANY, INC., a/k/a MICHEL FERTILIZER, an Illinois corporation, CARYLE MICHEL, and RONNIE TODD,) (2o.denent-water)))))))))))))))))))	
Respondents.)	

NOTICE OF FILING

To:

Doug Antonik Antonik Law Offices 1921 Broadway P.O. Box 594

F. William Bonan

Bonan and Bonan and Rowland

P.O. Box 309

McLeansboro, IL 62859

Mt. Vernon, IL 62864

PLEASE TAKE NOTICE that on this date, I mailed for filing with the Clerk of the Pollution Control Board of the State of Illinois NOTICES OF DISCOVERY DEPOSITIONS FOR CHRIS MICHEL, BRUCE ELLIS, MIKE BEAN, MARSHA BEAN and JEFF MOORE, copies of which are attached hereto and herewith served upon you.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS

LISA MADIGAN Attorney General of the State of Illinois

MATTHEW J. DUNN, Chief

Environmental Enforcement/Asbestos

Litigation Division

BY:

PHILLIP McQUILLAN Assistant Attorney General Environmental Bureau

500 South Second Street Springfield, Illinois 62706 217/782-9031 Dated: November 20, 2003

RECEIVED CLERK'S OFFICE

NOV 2 4 2003 CERTIFICATE OF SERVICE

STATE OF ILLINOIS

I hereby certify that I did on November 20, 2003, send by First Class Mail, with postage thereon fully prepaid, by depositing in a United States Post Office Box true and correct copies of the following instruments entitled NOTICE OF FILING and NOTICES OF DISCOVERY DEPOSITIONS FOR CHRIS MICHEL, BRUCE ELLIS, MIKE BEAN, MARSHA BEAN and JEFF MOORE

To:

Doug Antonik

Antonik Law Offices

1921 Broadway

P.O. Box 594

Mt. Vernon, IL 62864

F. William Bonan

Bonan and Bonan and Rowland

P.O. Box 309

McLeansboro, IL 62859

and the original and five copies by First Class Mail with postage thereon fully prepaid of the same foregoing instrument(s):

To:

Dorothy Gunn, Clerk

Illinois Pollution Control Board James R. Thompson Center

Suite 11-500

100 West Randolph Chicago, Illinois 60601

A copy was also sent by First Class Mail with postage thereon fully prepaid

To:

Carol Sudman

Hearing Officer

Pollution Control Board

1021 North Grand Avenue East

Springfield, Illinois 62702

Assistant Attorney General

This filing is submitted on recycled paper.

PEOPLE OF THE STATE OF ILLINOIS,	CLERK'S OFFICE
Complainant,) NOV 2 4 2003
vs.	STATE OF ILLINOIS) PCB No. 96-143 Pollution Control Board) (Enforcement - Water)
MICHEL GRAIN COMPANY, INC., d/b/a MICHEL FERTILIZER, an Illinois corporation, CARLYLE MICHEL, RONNIE TODD and RONNIE TODD LAND TRUST,))))
Respondents.)

NOTICE OF DISCOVERY DEPOSITION

TO: Douglas A. Antonik, Attorney at Law, P.O. Box 594, Mt. Vernon, IL 62864 William Bonan, Attorney at Law, P.O. Box 309, McLeansboro, IL 62859

WITNESS TO BE DEPOSED: Chris Michel

PLACE: Law Office of Douglas A. Antonik, 1921 Broadway, Mt. Vernon, IL 62864

DATE and TIME: December 9, 2003, at 9:00 a.m.

YOU ARE HEREBY NOTIFIED that we shall take the discovery deposition, upon oral examination, of the above-named individual at the time, date and place set forth above, pursuant to Supreme Court Rules 201, 204 and 206.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS LISA MADIGAN Attorney General of the State of Illinois

MATTHEW J. DUNN, Chief

Environmental Enforcement/Asbestos

Litigation Division,

PHILLIP McQUILLAN

Assistant Attorney General Environmental Bureau

No. 03122873 500 South Second Street Springfield, Illinois 62706 217/782-9031

		CLERK'S OFFICE
PEOPLE OF THE STATE OF ILLINOIS,)		NOV 2 4 2003
Complainant,)		STATE OF ILLINOIS Pollution Control Board
vs.	PCB No. 96-143	1 Onusion Dentities = 11
)	(Enforcement - Wat	er)
MICHEL GRAIN COMPANY, INC.,	•	•
d/b/a MICHEL FERTILIZER, an Illinois)		
corporation, CARLYLE MICHEL,		
RONNIE TODD and RONNIE TODD)		
LAND TRUST,		
Respondents.)		

NOTICE OF DISCOVERY DEPOSITION

TO: Douglas A. Antonik, Attorney at Law, P.O. Box 594, Mt. Vernon, IL 62864 William Bonan, Attorney at Law, P.O. Box 309, McLeansboro, IL 62859

WITNESS TO BE DEPOSED: Bruce Ellis

PLACE: Law Office of Douglas A. Antonik, 1921 Broadway, Mt. Vernon, IL 62864

DATE and TIME: December 1, 2003, at 4:00 p.m.

YOU ARE HEREBY NOTIFIED that we shall take the discovery deposition, upon oral examination, of the above-named individual at the time, date and place set forth above, pursuant to Supreme Court Rules 201, 204 and 206.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS LISA MADIGAN Attorney General of the State of Illinois

MATTHEW J. DUNN, Chief

Environmental Enforcement/Asbestos

Litigation Division

PHILLIP McOULLAN

Assistant Attorney General Environmental Bureau

No. 03122873 500 South Second Street Springfield, Illinois 62706 217/782-9031

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD RECEIVED CLERK'S OFFICE PEOPLE OF THE STATE OF ILLINOIS, NOV 2 4 2003 Complainant, STATE OF ILLINOIS Pollution Control Board PCB No. 96-143 vs. (Enforcement - Water) MICHEL GRAIN COMPANY, INC., d/b/a MICHEL FERTILIZER, an Illinois corporation, CARLYLE MICHEL, **RONNIE TODD and RONNIE TODD** LAND TRUST,

NOTICE OF DISCOVERY DEPOSITION

TO: Douglas A. Antonik, Attorney at Law, P.O. Box 594, Mt. Vernon, IL 62864 William Bonan, Attorney at Law, P.O. Box 309, McLeansboro, IL 62859

WITNESS TO BE DEPOSED: Jeff Moore

PLACE: Law Office of Douglas A. Antonik, 1921 Broadway, Mt. Vernon, IL 62864

DATE and TIME: December 9, 2003, at 11:00 a.m.

Respondents.

YOU ARE HEREBY NOTIFIED that we shall take the discovery deposition, upon oral examination, of the above-named individual at the time, date and place set forth above, pursuant to Supreme Court Rules 201, 204 and 206.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS LISA MADIGAN Attorney General of the State of Illinois

MATTHEW J. DUNN, Chief

Environmental Enforcement/Asbestos

Litigation Division

BY: / KULIG / CV.

Assistant Attorney General Environmental Bureau

No. 03122873 500 South Second Street Springfield, Illinois 62706 217/782-9031

DEODI E OE THE STATE OF ILLINOIS	CLERK'S OFFICE
PEOPLE OF THE STATE OF ILLINOIS,) NOV 2 4 2003
Complainant, vs.) STATE OF ILLINOIS) PCB No. 96-143 Pollution Control Board) (Enforcement - Water)
MICHEL GRAIN COMPANY, INC., d/b/a MICHEL FERTILIZER, an Illinois corporation, CARLYLE MICHEL, RONNIE TODD and RONNIE TODD LAND TRUST,))))))
Respondents.	,

NOTICE OF DISCOVERY DEPOSITION

TO: Douglas A. Antonik, Attorney at Law, P.O. Box 594, Mt. Vernon, IL 62864 William Bonan, Attorney at Law, P.O. Box 309, McLeansboro, IL 62859

WITNESS TO BE DEPOSED: Mike Bean

PLACE: Law Office of Douglas A. Antonik, 1921 Broadway, Mt. Vernon, IL 62864

DATE and TIME: December 1, 2003, at 2:30 p.m.

YOU ARE HEREBY NOTIFIED that we shall take the discovery deposition, upon oral examination, of the above-named individual at the time, date and place set forth above, pursuant to Supreme Court Rules 201, 204 and 206.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS LISA MADIGAN Attorney General of the State of Illinois

MATTHEW J. DUNN, Chief

Environmental Enforcement/Asbestos

Litigation Division

BY: /

PHILLIP McQUILLAN
Assistant Attorney Gener

Assistant Attorney General Environmental Bureau

No. 03122873 500 South Second Street Springfield, Illinois 62706 217/782-9031

PEOPLE OF THE STATE OF ILLINOIS,)) CLERK'S OFFICE	
) Complainant,)	NOV 2 4 2003	
) vs.)	STATE OF ILLINOIS PCB No. 96-143 Pollution Control Board (Enforcement - Water)	
MICHEL GRAIN COMPANY, INC., d/b/a MICHEL FERTILIZER, an Illinois corporation, CARLYLE MICHEL, RONNIE TODD and RONNIE TODD LAND TRUST,		
Respondents.		

NOTICE OF DISCOVERY DEPOSITION

TO: Douglas A. Antonik, Attorney at Law, P.O. Box 594, Mt. Vernon, IL 62864 William Bonan, Attorney at Law, P.O. Box 309, McLeansboro, IL 62859

WITNESS TO BE DEPOSED: Marsha Bean

PLACE: Law Office of Douglas A. Antonik, 1921 Broadway, Mt. Vernon, IL 62864

DATE and TIME: December 1, 2003, at 1:00 p.m.

YOU ARE HEREBY NOTIFIED that we shall take the discovery deposition, upon oral examination, of the above-named individual at the time, date and place set forth above, pursuant to Supreme Court Rules 201, 204 and 206.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS LISA MADIGAN Attorney General of the State of Illinois

DECEIVED

MATTHEW J. DUNN, Chief

Environmental Enforcement/Asbestos

Litigation Division

BY:

PHILLIP McQUILLAN

Assistant Attorney General Environmental Bureau

No. 03122873 500 South Second Street Springfield, Illinois 62706 217/782-9031

Dated: 11/20/03