

STATE OF ILLINOIS
POLLUTION CONTROL BOARD
JAMES R. THOMPSON CENTER
100 WEST RANDOLPH STREET, SUITE 11-500
CHICAGO, ILLINOIS 60601

RECEIVED

JUL 18 2004

BEFORE THE
ILLINOIS POLLUTION CONTROL BOARD

STATE OF ILLINOIS
POLLUTION CONTROL BOARD

L. ERICKSON)	
Complainant,)	
)	
v.)	PCB 04-26
)	
CHARLESTON CLASSIC HOMES,)	
INC., and LAWRENCE E. VAN)	
SOMEREN, JR.)	
Respondent.)	

RESPONDENT'S FIRST SET OF INTERROGATORIES

Now Comes Respondents CHARLESTON CLASSIC HOMES and LAWRENCE E. VAN SOMEREN, JR. (hereinafter referred to as "Respondent"), by and through their attorneys, THOMAS A. APPEL and APPEL & APPEL, LTD., and pursuant to Section 101.620 request that you produce the documents listed below for inspection, copying, and production within twenty-eight (28) days of the date of this Request at the offices of APPEL & APPEL, LTD., 18607 Torrence Avenue - Suite 2A; Lansing, Illinois 60438.

INTERROGATORY NO. 1

Identify all persons who will testify in support of any of the allegations made in Complainant's Formal Complaint, and with respect to each such person state the subject matter of their testimony and any opinion which may be given by such person.

ANSWER

INTERROGATORY NO. 2

Identify all neighbors, including name, address and telephone whom Complainant believes have been adversely affected by any noise generated by the Respondent.

ANSWER

INTERROGATORY NO. 3

Identify any equipment used by Complainant to create any sound recordings of noise generated by Respondent.

ANSWER

INTERROGATORY NO. 4

Identify any equipment used by Complainant to track or log the days of the week or the hours worked by Respondent or any of its subcontractors.

ANSWER

INTERROGATORY NO. 5

Identify all persons residing at 317 East Hawthorne Boulevard in Wheaton, Illinois between July 16, 2003 and November 30, 2003, and with respect to each such person state their current address and telephone number.

ANSWER

INTERROGATORY NO. 6

Identify any physicians, therapists or health care providers of any kind seen by Complainant as a result of any purported noise generated by the Respondent, and with respect to each such person state their current address and telephone number, and with respect to each such person state:

- a) the date of such visit;
- b) any diagnosis;
- c) any medication prescribed as a result of such visit.

ANSWER

INTERROGATORY NO. 7

Identify the dates that Complainant alleges she was forced to move out of her home as a result of any purported noise generated by Respondent, and with respect to each such date state:

- a) the duration of which she left her home;
- b) any alleged cost incurred by Complainant in moving out of her home;

ANSWER

INTERROGATORY NO. 8

State the name, address and telephone number of your employer and with respect to your employment state:

- a) your occupation;
- b) your annual income earned from your occupation for years 2001, 2002 and 2003;
- c) identify the amount of income which you contend you lost as a result of any purported noise generated by Respondent

ANSWER

INTERROGATORY NO. 9

Describe how any noise generated by Respondent resulted in a loss of income to you.

ANSWER

CHARLESTON CLASSIC HOMES, INC.
LAWRENCE E. VAN SOMEREN, JR.

BY: 

One of their attorneys

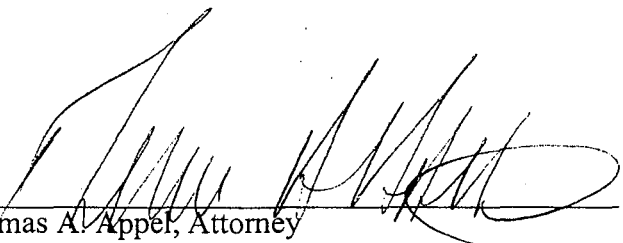
CERTIFICATE OF SERVICE

I, the undersigned, certify that I have served the attached Interrogatories by regular U.S. Mail, upon the following persons:

Clerk, Illinois Pollution Control Board
100 West Randolph Street
James R. Thompson Center - Suite 11-500
Chicago, Illinois 60601-3218

Carol Sudman
Hearing Officer
ILLINOIS POLLUTION CONTROL BOARD
1021 N. Grand Ave. E
P.O. Box 19274
Springfield IL 62794-9274

Lynn Erickson
317 East Hawthorne Boulevard
Wheaton, Illinois 60187


Thomas A. Appel, Attorney

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