

RECEIVED CLERK'S OFFICE

NOV 0 3 2004

STATE OF ILLINOIS Pollution Control Board

# OFFICE OF THE ATTORNEY GENERAL STATE OF ILLINOIS

Lisa Madigan

November 1, 2004

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 to GENE DELAP, BILL DELAP, TOM FERRELL, VICTOR KNIGHT, JERRY LAUNIUS and VERNON MAYBERRY, 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.

Very truly yours,

Quilla

Phillip McQuillan Environmental Bureau 500 South Second Street Springfield, Illinois 62706 (217) 782-9031

PM/pp Enclosures

· GCN.-

RECEIVED CLERK'S OFFICE

#### PEOPLE OF THE STATE OF ILLINOIS,

NOV 0 3 2004

STATE OF ILLINOIS Pollution Control Board

Complainant,

vs.

MICHEL GRAIN COMPANY, INC., a/k/a MICHEL FERTILIZER, an Illinois corporation, CARYLE MICHEL, and RONNIE TODD,

# PCB 96-143 (Enforcement-Water)

Respondents.

## **NOTICE OF FILING**

To: Doug Antonik Antonik Law Offices 411 Main Street Mt. Vernon, IL 62864 F. William Bonan Bonan and Bonan and Rowland P.O. Box 309 McLeansboro, IL 62859

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 to GENE DELAP,

BILL DELAP, TOM FERRELL, VICTOR KNIGHT, JERRY LAUNIUS and VERNON MAYBERRY,

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

## CERTIFICATE OF SERVICE

I hereby certify that I did on November 1, 2004, 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 TO GENE DELAP, BILL DELAP, TOM FERRELL, VICTOR KNIGHT, JERRY LAUNIUS and VERNON MAYBERRY

To: Doug Antonik Antonik Law Offices 411 Main Street 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

c Quelle

Phillip McQuillan ( Assistant Attorney General

This filing is submitted on recycled paper.

## RECEIVED CLERK'S OFFICE

# PEOPLE OF THE STATE OF ILLINOIS,

Complainant,

vs.

MICHEL GRAIN COMPANY, INC., d/b/a MICHEL FERTILIZER, an Illinois corporation, CARYLE MICHEL, RONNIE TODD and RONNIE TODD LAND TRUST,

# NOV 0 3 2004

STATE OF ILLINOIS Pollution Control Board

PCB No. 96-143 (Enforcement - Water)

#### 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: Gene Delap

PLACE: Law Office of Bonan and Bonan, 116 East Market, McLeansboro, IL 62859

DATE and TIME: November 17, 2004, at 2:00 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, BY:

PHILLIP/McQUILLAN Assistant Attorney General Environmental Bureau

# PEOPLE OF THE STATE OF ILLINOIS,

Complainant,

vs.

MICHEL GRAIN COMPANY, INC., d/b/a MICHEL FERTILIZER, an Illinois corporation, CARYLE MICHEL, RONNIE TODD and RONNIE TODD LAND TRUST, PCB No. 96-143 (Enforcement - Water) RECEIVED CLERK'S OFFICE

NOV 03 2004

STATE OF ILLINOIS Pollution Control Board

#### 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: Bill Delap

PLACE: Law Office of Bonan and Bonan, 116 East Market, McLeansboro, IL 62859

DATE and TIME: November 17, 2004, 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

MATTHEW J. DUNN, Chief Environmental Enforcement/Asbestos

Litigation Division BY:

PHILLIP McQUILLAN Assistant Attorney General Environmental Bureau

## PEOPLE OF THE STATE OF ILLINOIS,

Complainant,

vs.

MICHEL GRAIN COMPANY, INC., d/b/a MICHEL FERTILIZER, an Illinois corporation, CARYLE MICHEL, RONNIE TODD and RONNIE TODD LAND TRUST,

### RECEIVED CLERK'S OFFICE

NOV 0 3 2004

STATE OF ILLINOIS Pollution Control Board

PCB No. 96-143 (Enforcement - Water)

#### 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: Tom Ferrell

PLACE: Law Office of Bonan and Bonan, 116 East Market, McLeansboro, IL 62859

DATE and TIME: November 17, 2004, at 11:00 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

mille. BY:

PHILLIP McQUILLAN Assistant Attorney General Environmental Bureau

# RECEIVED CLERK'S OFFICE

# PEOPLE OF THE STATE OF ILLINOIS,

Complainant,

vs.

MICHEL GRAIN COMPANY, INC., d/b/a MICHEL FERTILIZER, an Illinois corporation, CARYLE MICHEL, RONNIE TODD and RONNIE TODD LAND TRUST,

# NOV 0 3 2004

STATE OF ILLINOIS Pollution Control Board

PCB No. 96-143 (Enforcement - Water)

#### 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: Victor Knight

PLACE: Law Office of Bonan and Bonan, 116 East Market, McLeansboro, IL 62859

DATE and TIME: November 17, 2004, 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,

BY:

PHILLI McQUI(LLAN Assistant Attorney General Environmental Bureau

# BEFORE THE ILLINOIS POLLUTION CONTROL BOARD RECEIVED CLERK'S OFFICE

#### PEOPLE OF THE STATE OF ILLINOIS,

Complainant,

vs.

MICHEL GRAIN COMPANY, INC., d/b/a MICHEL FERTILIZER, an Illinois corporation, CARYLE MICHEL, RONNIE TODD and RONNIE TODD LAND TRUST,

# NOV 0 3 2004

STATE OF ILLINOIS Pollution Control Board

PCB No. 96-143 (Enforcement - Water)

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: Jerry Launius

PLACE: Law Office of Bonan and Bonan, 116 East Market, McLeansboro, IL 62859

DATE and TIME: November 17, 2004, at 9:30 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 BY:

PHILLIP McQUILLAN Assistant Attorney General Environmental Bureau

## PEOPLE OF THE STATE OF ILLINOIS,

Complainant,

vs.

MICHEL GRAIN COMPANY, INC., d/b/a MICHEL FERTILIZER, an Illinois corporation, CARYLE 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: Vernon Mayberry

PLACE: Law Office of Bonan and Bonan, 116 East Market, McLeansboro, IL 62859

DATE and TIME: November 17, 2004, at 3:00 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 BY:

PHILLIP<sup>A</sup>McQUILLAN Assistant Attorney General Environmental Bureau

No. 03122873 500 South Second Street Springfield, Illinois 62706 217/782-9031 Dated: November 1, 2004 RECEIVED CLERK'S OFFICE

NOV 0 3 2004

STATE OF ILLINOIS Pollution Control Board

PCB No. 96-143 (Enforcement - Water)