

DEC 13 2004

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

STATE OF ILLINOIS
Pollution Control Board

PEOPLE OF THE STATE OF ILLINOIS)
)
Complainant,)
)
vs.)
)
COMMUNITY LANDFILL COMPANY, INC.,)
an Illinois corporation, and the CITY OF)
MORRIS, an Illinois municipal corporation.)
)
Respondents.)

Case No. PCB 03-191

NOTICE OF DISCOVERY DEPOSITION

TO: See attached Affidavit of Service


On December 13, 2004, at 1:00 p.m., at 1021 N. Grand, Springfield, Illinois, the deposition of Christine Roque will be taken before a notary public, on oral interrogatories for discovery in this case, and at that time the deponent shall produce all the documents requested on the attached rider.

Dated: 12-9, 2004

Respectfully Submitted,

On behalf of the CITY OF MORRIS

By: Hinshaw & Culbertson LLP


Richard S. Porter
One of Attorneys

HINSHAW & CULBERTSON LLP
100 Park Avenue
P.O. Box 1389
Rockford, IL 61105-1389
815-490-4900

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DEPOSITION RIDER

You are hereby instructed to bring with you, and have present with you at the discovery deposition in this case, the following documents:

1. All records, documents and other tangible items received by the deponent for review concerning this case or any of the deponent's anticipated testimony, whether or not in fact reviewed.
2. All other records, documents or other tangible items reviewed or consulted by deponent in connection with this lawsuit.
3. The deponent's complete file pertaining to this lawsuit.
4. All Correspondence or other communications received by deponent relative to this lawsuit.
5. All correspondence or other communications generated by the deponent relative to this lawsuit.
6. All notes (including notations made on records) relative to the deponent's review and opinions.
7. All literature, standards, guidelines, texts, statute, regulations, rules, policies, procedures, protocols and the like, which deponent (a) has consulted in connection with his/her review, (b) relies upon, or (c) may otherwise use or refer to at trial.
8. All bills, time records and other billing records pertaining to deponent's activities in this lawsuit, if any.
9. All reports, memoranda, summaries or other writing (including drafts) prepared by deponent relative to this lawsuit.
10. Deponent's current curriculum vitae.
11. Complete records reflecting deponent's billings and payments received for expert witness activities for the preceding five calendar years, including, but not limited to, review of records, consultation and testimony for any attorney, if any.
12. A printout of any and all e-mail or other electronic communications between the deponent and attorneys for the Illinois Environmental Protection Agency, or anyone acting on their behalf, or in anyway concerning this lawsuit or the parties to this lawsuit.

The foregoing requests shall include any computer-stored data, which shall be produced in a form that is readable by the participants in the deposition.

If any of the above-requested materials are not produced at the deposition, the noticing party may, at his/her election, (a) continue the deposition to another date, (b) adjourn and complete the deposition at another time, (c) see court supervision of the deposition, and/or (d) seek other relief from the court, including but not limited to, costs and fees.

AFFIDAVIT OF SERVICE

The undersigned, pursuant to the provisions of Section 1-109 of the Illinois Code of Civil Procedure, hereby under penalty of perjury under the laws of the United States of America, certifies that on December 9, 2004, she served a copy of the foregoing upon:

Documents Sent Via Facsimile:

Mr. Christopher Grant
Assistant Attorney General
Environmental Bureau
188 W. Randolph St., 20th Fl.
Chicago, IL 60601

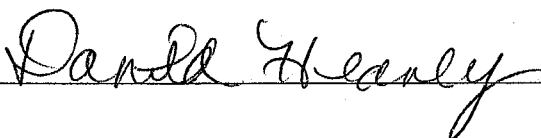
Documents Sent Via Facsimile:

Clarrisa Grayson
LaRose & Bosco, Ltd.
734 N. Wells Street
Chicago, IL 60601

Ms. Dorothy Gunn, Clerk
Pollution Control Board
100 W. Randolph, Suite 11-500
Chicago, IL 60601

Bradley Halloran
Hearing Officer
Pollution Control Board
100 W. Randolph, Suite 11
Chicago, IL 60601

Via facsimile and regular mail from Rockford, Illinois, addressed as above.



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