

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

RECEIVED
CLERK'S OFFICE

JUN 02 2005

STATE OF ILLINOIS
Pollution Control Board

PEOPLE OF THE STATE OF ILLINOIS,)

Complainant,)

v.)

PCB NO. 00-104
(Enforcement)

THE HIGHLANDS, LLC, an Illinois limited
liability corporation, and MURPHY
FARMS, INC., (a division of MURPHY-
BROWN, LLC, a North Carolina limited
liability corporation, and SMITHFIELD
FOODS, INC., a Virginia corporation),)

Respondents.)

NOTICE OF FILING

To: Mr. Jeffrey W. Tock
Harrington, Tock & Royse
201 W. Springfield Avenue
Suite 601
Champaign, IL 61824-1550

Mr. Charles M. Gering, Esq.
McDermott, Will & Emery
227 West Monroe Street
Chicago, IL 60606-5096

PLEASE TAKE NOTICE that on May 27, 2005, I mailed for filing with the Clerk of the Pollution Control Board of the State of Illinois, PROPOSED REVISED AGREED DISCOVERY SCHEDULE FOR COMPLAINANT AND RESPONDENT HIGHLANDS and PROPOSED AGREED DISCOVERY SCHEDULE FOR COMPLAINANT AND RESPONDENT MURPHY FARMS, INC., a copy of each is 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: 

JANE E. McBRIDE
Assistant Attorney General
Environmental Bureau

500 South Second Street
Springfield, Illinois 62706
217/782-9031
Dated: May 27, 2005

CERTIFICATE OF SERVICE

I hereby certify that I did on May 27, 2005, send by First Class Mail, with postage thereon fully prepaid, by depositing in a United States Post Office Box a true and correct copy of the following instruments entitled NOTICE OF FILING, PROPOSED REVISED AGREED DISCOVERY SCHEDULE FOR COMPLAINANT AND RESPONDENT HIGHLANDS and PROPOSED AGREED DISCOVERY SCHEDULE FOR COMPLAINANT AND RESPONDENT MURPHY FARMS, INC.

To: Mr. Jeffrey W. Tock
Harrington, Tock & Royse
201 W. Springfield Avenue, Ste. 601
P.O. Box 1550
Champaign, IL 61824-1550

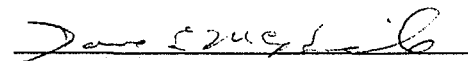
Mr. Charles M. Gering, Esq.
McDermott, Will & Emery
227 West Monroe Street
Chicago, IL 60606-5096

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

To: Dorothy Gunn, Clerk
Illinois Pollution Control Board
State of Illinois Center
Suite 11-500
100 West Randolph
Chicago, Illinois 60601

A copy was also sent by sending through facsimile at 312-814-3669 and by First Class Mail with postage thereon fully prepaid

To: Mr. Brad Halloran, Hearing Officer
Illinois Pollution Control Board
State of Illinois Center, Ste. 11-500
100 West Randolph
Chicago, IL 60601


Jane E. McBride
Assistant Attorney General

This filing is submitted on recycled paper.

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Respondents.

PCB No. 00-104
(Enforcement)

**PROPOSED REVISED AGREED DISCOVERY SCHEDULE FOR
COMPLAINANT AND RESPONDENT HIGHLANDS**

NOW COMES the Complainant, PEOPLE OF THE STATE OF ILLINOIS, and with the
agreement and approval of the Respondent THE HIGHLANDS, LLC, hereby submits the
following proposed agreed discovery schedule for the continuing litigation between these two
parties:

All parties submit responses for
all outstanding written discovery

July 15, 2005

Depositions completed by all parties

November 15, 2005

All written discovery filed and served

December 15, 2005

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:


JANE E. MCBRIDE
Assistant Attorney General

500 South Second Street
Springfield, Illinois 62706
(217) 782-9031
Dated: May 27, 2005

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Respondents.

STATE OF ILLINOIS
Pollution Control Board

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**PROPOSED AGREED DISCOVERY SCHEDULE FOR
COMPLAINANT AND RESPONDENT MURPHY FARMS, INC.**

NOW COMES the Complainant, PEOPLE OF THE STATE OF ILLINOIS, and with the
agreement and approval of the Respondent MURPHY FARMS, INC., hereby submits the
following proposed agreed discovery schedule for the continuing litigation between these two
parties:

All parties submit responses for
all outstanding written discovery

July 15, 2005

Complainant shall disclose opinion witnesses
and opinions

July 15, 2005

Respondent Highlands shall disclose
opinion witnesses and opinions

August 15, 2005

Depositions completed by all parties

November 15, 2005

All written discovery filed and served

December 15, 2005

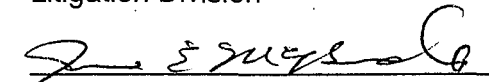
Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS

LISA MADIGAN,
Attorney General of the State of Illinois

MATTHEW J. DUNN, Chief
Environmental Enforcement/Asbestos
Litigation Division

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