

ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS )  
 )  
 Complainant, )  
 vs. )  
 )  
 FIRST COUNTRY HOMES, L.L.C., an Illinois )  
 Limited liability company, )  
 )  
 Respondents )

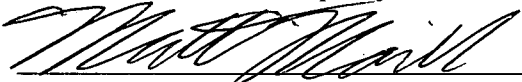
PCB 06-173  
(Enforcement – Water)

**NOTICE OF FILING**

TO: Thomas G. Gardiner  
Gardiner Koch & Weisberg  
53 West Jackson Blvd.  
Suite 950  
Chicago, Illinois 60604-3849

Mr. Bradley P. Halloran  
Hearing Officer  
Illinois Pollution Control Board  
James R. Thompson Center, Suite 11-500  
100 West Randolph  
Chicago, Illinois 60601

PLEASE TAKE NOTICE that I have today electronically filed with the Office of the Clerk of the Pollution Control Board a Proposed Discovery Schedule, a copy of which is attached and herewith served upon you.

By:  Dated: July 31, 2006  
Matthew Marinelli

PEOPLE OF THE STATE OF ILLINOIS  
LISA MADIGAN  
Attorney General of the State of Illinois  
By: Assistant Attorney General Matthew Marinelli  
Environmental Bureau  
188 West Randolph St., 20<sup>th</sup> Floor  
Chicago, IL 60601  
312-814-0608

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS	)	
	)	
Complainant,	)	
	)	
vs.	)	
	)	PCB No. 06-173
	)	(Enforcement - Water)
FIRST COUNTRY HOMES, L.L.C., an	)	
Illinois corporation	)	
	)	
Respondent.	)	

**PROPOSED DISCOVERY SCHEDULE**

NOW COMES Complainant, People of the State of Illinois, through its attorney, LISA MADIGAN, Attorney General of the State of Illinois, hereby proposing the following simultaneous discovery schedule in the above-captioned matter:

1. Written discovery, including but not limited to, interrogatories, document requests, and requests for admission shall be propounded by 30 days after the entry of this order;
2. Responses to written discovery shall be completed by 60 days after the entry of this order;
3. Fact depositions shall be completed by 90 days after the entry of this order;
4. Notices of expert depositions, including but not limited to, depositions and subpoenas, shall be served by 105 days after the entry of this order.
5. Expert depositions shall be completed by 135 days after the entry of this order;
6. Nothing in this Order shall preclude the filing of any motion or form of discovery prior to the date set forth in this Order and any such earlier filing shall not preclude the filing of additional discovery of that type so long as the additional discovery is timely as provided in this Order;
7. The parties reserve the right to seek leave to conduct additional discovery to the extent that prior discovery responses warrant additional discovery.

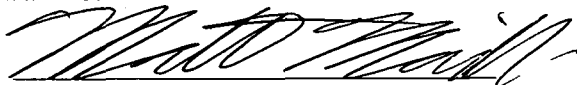
WHEREFORE, Complainant requests that the above discovery schedule be granted.

Respectfully submitted,

For the Complainant:

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

BY:



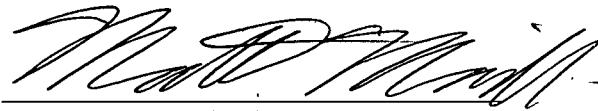
Matthew Marinelli  
Assistant Attorney General  
Environmental Bureau  
188 W. Randolph St. - 20th Fl.  
Chicago, Illinois 60601  
(312) 814-0608

**CERTIFICATE OF SERVICE**

I, MATTHEW MARINELLI, an Assistant Attorney General, do certify that I caused the foregoing PROPOSED DISCOVERY SCHEDULE to be served upon the persons listed on the said NOTICE on this 31st day of July, 2006, by facsimile and first-class mail in a postage prepaid envelope and depositing same with the United States Postal Service located at 188 West Randolph Street, Chicago, Illinois, 60601.

It is hereby certified that a true copy of the foregoing Notice was electronically filed with the following on July 31, 2006:

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



MATTHEW MARINELLI  
Assistant Attorney General  
Environmental Bureau  
188 West Randolph St., 20<sup>th</sup> Floor  
Chicago, Illinois 60601  
312-814-0608