

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

**RECEIVED**  
CLERK'S OFFICE

AUG 14 2006

STATE OF ILLINOIS  
Pollution Control Board

PEORIA DISPOSAL COMPANY,

Petitioner,

v.

PEORIA COUNTY BOARD,

Respondent.

PCB 06-184

(Pollution Control Facility Siting Appeal)

**NOTICE TO APPEAR FOR DISCOVERY DEPOSITION**

**TO: MEGAN FULARA**, Deputy Peoria County Clerk  
c/o Mr. David A. Brown  
Black, Black & Brown  
101 South Main Street  
P.O. Box 381  
Morton, Illinois 61550

You are hereby notified that you are required to appear and testify at a discovery deposition, on **Friday, August 18, 2006, at 2:00 p.m.**, at the law offices of Elias, Meginnnes, Riffle & Seghetti, P.C., 416 Main Street, Suite 1400, Peoria, IL 61602, and you are hereby further notified that you are required to produce at the deposition, all of the documents or tangible things identified in Rider A, attached hereto.

Respectfully submitted,  
Peoria Disposal Company, Petitioner

  
\_\_\_\_\_  
BRIAN J. MEGINNES and  
GEORGE MUELLER, Its Attorneys

GEORGE MUELLER  
628 Columbus Street, Suite #204  
Ottawa, Illinois 61350  
(815) 431-1500 - Telephone  
(815) 431-1501 - Facsimile  
[george@muelleranderson.com](mailto:george@muelleranderson.com)

BRIAN J. MEGINNES  
416 Main Street, Suite #1400  
Peoria, Illinois 61602-1611  
(309) 637-6000 - Telephone  
(309) 637-8514 - Facsimile  
[bmeginnnes@emrslaw.com](mailto:bmeginnnes@emrslaw.com)

AUG 14 2006

STATE OF ILLINOIS  
Pollution Control Board

**RIDER A**

1. All documents in the possession or control of MEGAN FULARA ("Deponent") setting forth or pertaining to the process or procedure by which the Record filed with the Pollution Control Board pursuant to Illinois Administrative Code Title 35, Section 107.300, was compiled.

2. All documents in the possession or control of Deponent pertaining to the process or procedure by which the Record was kept by the Peoria County Clerk.

3. All documents in the possession or control of Deponent referring to the Application that were not included in the Record filed with the Pollution Control Board pursuant to Illinois Administrative Code Title 35, Section 107.300.

4. Any document in the possession or control of Deponent received or created by any member of the Peoria County Board referring to the Application that was not included in the Record filed with the Pollution Control Board pursuant to Illinois Administrative Code Title 35, Section 107.300.

5. All documents in the possession or control of Deponent referring to Peoria Disposal Company that were not included in the Record filed with the Pollution Control Board pursuant to Illinois Administrative Code Title 35, Section 107.300.

6. All documents in the possession or control of Deponent received from any member or representative of the Heart of Illinois Sierra Club that were not included in the Record filed with the Pollution Control Board pursuant to Illinois Administrative Code Title 35, Section 107.300.

7. All documents in the possession or control of Deponent received from any member or representative of the organization Peoria Families Against Toxic Waste that were not included in the Record filed with the Pollution Control Board pursuant to Illinois Administrative Code Title 35, Section 107.300.

8. All documents in the possession or control of Deponent received from any member or representative of the organization Citizens for Our Environment that were not included in the Record filed with the Pollution Control Board pursuant to Illinois Administrative Code Title 35, Section 107.300.

9. All documents in the possession or control of Deponent received from any member or representative of the organization River Rescue that were not included in the Record filed with the Pollution Control Board pursuant to Illinois Administrative Code Title 35, Section 107.300.

10. All documents in the possession or control of Deponent portraying the PDC 1 landfill or any property located within one (1) mile of the PDC 1 landfill that were not included in the Record filed with the Pollution Control Board pursuant to Illinois Administrative Code Title 35, Section 107.300.

11. All documents in the possession or control of Deponent, including, without limitation, notes, drafts, memoranda, correspondence and transcripts, considered by the Peoria County Board regarding the Application.

12. All documents in the possession or control of Deponent, including, without limitation, notes, drafts, memoranda, correspondence and transcripts, available to the Peoria County Board in its consideration of the Application.

13. All documents in the possession or control of Deponent, including, without limitation, notes, drafts, memoranda, correspondence and transcripts, considered by the staff of the Peoria County Board regarding the Application.

14. All documents in the possession or control of Deponent, including, without limitation, notes, drafts, memoranda, correspondence and transcripts, available to the staff of the Peoria County Board in their consideration of the Application.

15. All documents in the possession or control of Deponent reflecting membership of any member of the Peoria County Board in the Heart of Illinois Sierra Club that were not included in the Record filed with the Pollution Control Board pursuant to Illinois Administrative Code Title 35, Section 107.300.

16. All documents in the possession or control of Deponent reflecting membership of any member of the Peoria County Board in the Sierra Club that were not included in the Record filed with the Pollution Control Board pursuant to Illinois Administrative Code Title 35, Section 107.300.

17. All documents in the possession or control of Deponent reflecting membership of any member of the Peoria County Board in the organization Peoria Families Against Toxic Waste that were not included in the Record filed with the Pollution Control Board pursuant to Illinois Administrative Code Title 35, Section 107.300.

18. All documents in the possession or control of Deponent received from or authored by Citizens for Our Environment that were not included in the Record filed with

the Pollution Control Board pursuant to Illinois Administrative Code Title 35, Section 107.300.

19. All documents in the possession or control of Deponent received from or authored by River Rescue that were not included in the Record filed with the Pollution Control Board pursuant to Illinois Administrative Code Title 35, Section 107.300.

20. All documents in the possession or control of Deponent received from or authored by Tom Edwards that were not included in the Record filed with the Pollution Control Board pursuant to Illinois Administrative Code Title 35, Section 107.300.

21. All documents in the possession or control of Deponent received from or authored by Kim Converse that were not included in the Record filed with the Pollution Control Board pursuant to Illinois Administrative Code Title 35, Section 107.300.

22. All documents in the possession or control of Deponent received from or authored by Joyce Blumenshine that were not included in the Record filed with the Pollution Control Board pursuant to Illinois Administrative Code Title 35, Section 107.300.

23. All documents in the possession or control of Deponent received from or authored by Diane Storey that were not included in the Record filed with the Pollution Control Board pursuant to Illinois Administrative Code Title 35, Section 107.300.

24. All documents in the possession or control of Deponent received from or authored by Jean Roach that were not included in the Record filed with the Pollution Control Board pursuant to Illinois Administrative Code Title 35, Section 107.300.

25. All documents in the possession or control of Deponent received from or authored by Amy Schlicksup that were not included in the Record filed with the Pollution Control Board pursuant to Illinois Administrative Code Title 35, Section 107.300.

26. All documents in the possession or control of Deponent received from or authored by Cara Rosson that were not included in the Record filed with the Pollution Control Board pursuant to Illinois Administrative Code Title 35, Section 107.300.

27. All documents in the possession or control of Deponent received from or authored by Tessie Bucklar that were not included in the Record filed with the Pollution Control Board pursuant to Illinois Administrative Code Title 35, Section 107.300.

28. All documents in the possession or control of Deponent received from or authored by Mayvis Young that were not included in the Record filed with the Pollution Control Board pursuant to Illinois Administrative Code Title 35, Section 107.300.

29. All documents in the possession or control of Deponent received from or authored by Lisa Offutt that were not included in the Record filed with the Pollution Control Board pursuant to Illinois Administrative Code Title 35, Section 107.300.

30. All documents in the possession or control of Deponent received from or authored by Peter Offutt that were not included in the Record filed with the Pollution Control Board pursuant to Illinois Administrative Code Title 35, Section 107.300.

906-1068

STATE OF ILLINOIS     )  
                                      )  
COUNTY OF PEORIA     )     SS

**AFFIDAVIT OF SERVICE & FILING**

The undersigned being first duly sworn on oath, states that a copy of the foregoing NOTICE TO APPEAR FOR DISCOVERY DEPOSITION was served upon the following persons by enclosing copies of same in separate envelopes, addressed as set forth below, and depositing said envelopes in a U.S. Postal Service mailbox in Peoria, Illinois, on the 9th day of August, 2006, before 5:00 p.m., with all fees thereon fully prepaid.

Illinois Pollution Control Board  
100 W. Randolph, Suite 11-500  
Chicago, Illinois 60601  
(312) 814-3620 – Telephone  
(312) 814-3669 – Facsimile  
[ORIGINAL plus FOUR (4)]

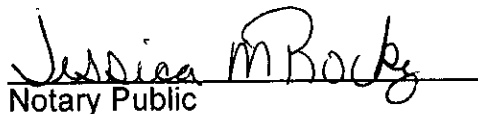
Ms. Carol Webb, Hearing Officer  
Illinois Pollution Control Board  
1021 North Grand Avenue East  
P.O. Box 19274  
Springfield, Illinois 62794-9274  
(217) 524-8503 – Telephone  
webbc@ipcb.state.il.us

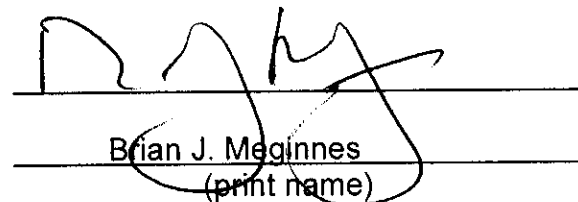
The undersigned further states that a copy of the foregoing NOTICE TO APPEAR FOR DISCOVERY DEPOSITION was served upon the following persons by facsimile and by enclosing copies of same in separate envelopes, addressed as set forth below, and depositing said envelopes in a U.S. Postal Service mailbox in Peoria, Illinois, on the 9th day of August, 2006, before 5:00 p.m., with all fees thereon fully prepaid.

Mr. David A. Brown  
Black, Black & Brown  
101 South Main Street  
P.O. Box 381  
Morton, Illinois 61550  
(309) 266-9680 – Telephone  
(309) 266-8301 – Facsimile  
dbrown@blackblackbrown.com

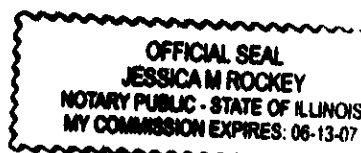
Mr. Kevin Lyons  
Peoria County State's Attorney  
324 Main Street, Room #111  
Peoria, Illinois 61602  
(309) 672-6029 – Facsimile

Subscribed and sworn to before me  
this 8th day of August, 2006.

  
Notary Public

  
Brian J. Meginnes  
(print name)

GEORGE MUELLER  
628 Columbus Street, Suite #204  
Ottawa, Illinois 61350  
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