BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

| PEOPLE OF THE PEOPLE OF ILLINOIS, | `) • | |
|---|------|---------------------|
| Complainant, |) | |
| v. |) | PCB No. 13 - 12 |
| NACME STEEL PROCESSING, LLC, |) | (Enforcement – Air) |
| a Delaware limited liability corporation, |) | |
| Respondent. |) | |

NOTICE OF SERVICE

To: See Attached Service List. (VIA ELECTRONIC FILING)

PLEASE TAKE NOTICE that I have today filed with the Illinois Pollution Control Board, the <u>Agreed Joint Motion to Revise Discovery Schedule.</u>

Respectfully submitted,

Nancy-J. Tikelsky

Assistant Attorney General Office of the Illinois Attorney General Environmental Bureau

69 West Washington Street, Suite 1800 Chicago, Illinois 60602

(312) 814-8567

Date: April 18, 2013

THIS FILING IS SUBMITTED ON RECYCLED PAPER

SERVICE LIST

Edward V. Walsh, III ReedSmith LLP 10 South Wacker Drive Chicago, Illinois 60606-7507 Via email attachment

Bradley P. Halloran, Hearing Officer Illinois Pollution Control Board 100 W. Randolph Street, Suite 11-500 Chicago, Illinois 60601 via email attachment

Maureen Wozniak
Division of Legal Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
via email attachment

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

| PEOPLE OF THE PEOPLE OF ILLINOIS, |) | |
|--|---|-----|
| Complainant, |) | |
| v. |) PCB No. 13 - 12) (Enforcement – A | ir) |
| NACME STEEL PROCESSING, LLC, a Delaware limited liability corporation, |) | , |
| Respondent. |)) | |

CERTIFICATE OF SERVICE

I, the undersigned attorney at law, hereby certify that on April 18, 2013, I served true and correct copies of Joint Motion to Revise Discovery Schedule, upon the persons and by the methods as follows:

[email attachment]

Edward V. Walsh, III ReedSmith LLP 10 South Wacker Drive Chicago, Illinois 60606-7507

[email attachment]

Bradley P. Halloran, Hearing Officer Illinois Pollution Control Board 100 W. Randolph Street, Suite 11-500 Chicago, Illinois 60601

Nancy J. Tilkilsky
Assistant Attorney General
Office of the Illinois Attorney General
Environmental Bureau
69 West Washington Street, Suite 1800
Chicago, IL 60602

(312) 814-8567

Date: April 18, 2013

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

| PEOPLE OF THE STATE OF ILLINOIS, |) | |
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| |) | |
| Complainant, |) | |
| |) | |
| . v. |) | PCB No. 13 - 12 |
| |) | (Enforcement - Air) |
| NACME STEEL PROCESSING, LLC, |) | |
| a Delaware limited liability corporation, |) | |
| |) | |
| Respondent. |) | |

AGREED JOINT MOTION TO REVISE DISCOVERY SCHEDULE

The Parties hereby motion to revise the discovery schedule to more accurately reflect the necessary time to review, disclose and depose expert witnesses, and requests the Board grant it leave for following revisions to the discovery schedule.

1. On November 14, 2012 the Board entered an Order with the following schedule for discovery:

| Completion of all Written Discovery Requests | 2/28/2013 |
|---|-----------|
| Disclosure of all Witnesses who will testify at the | 4/30/2013 |
| Hearing, including Expert Witnesses and Opinions | |
| Completion of all Depositions, including Expert and | 5/31/2013 |
| Close of Discovery | |

2. The Parties request a revision of the following schedule for discovery as follows:

| Disclosure of all Lay Witnesses who may testify at | 4/30/2013 |
|--|-----------|
| the Hearing | |
| Completion of all Depositions of Lay Witnesses | 5/31/2013 |
| Disclosure of all Expert Witnesses who may testify | 6/28/2013 |
| at the Hearing | |
| Filing of Rebuttal Reports of Expert Witnesses Due | 7/31/2013 |
| Completion of all Depositions of Expert Witnesses | 8/30/2013 |
| and Close of Discovery | |

WHEREFORE, the Parties respectfully request that the Board enter an order revising the discovery schedule pursuant to paragraph 2 herein.

Respectfully submitted,

PEOPLE OF THE PEOPLE OF ILLINOIS, LISA

MADIGAN

Attorney General of the People of Illinois

Complainant

Assistant Attorneys General Environmental Bureau

69 W. Washington Street, Suite 1800

Chicago, Illinois 60602

(312) 814-8567

NACME STEEL PROCESSING, L.L.C., Respondent

One of Its attorneys

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