

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

TIMBER CREEK HOMES, INC.	)	
	)	
Petitioner,	)	
	)	PCB No. 14-99
v.	)	(Pollution Control Facility
	)	Siting Appeal)
VILLAGE OF ROUND LAKE PARK,	)	
ROUND LAKE PARK VILLAGE BOARD	)	
And GROOT INDUSTRIES, INC.	)	
	)	
Respondents.	)	

**AMENDED NOTICE OF DEPOSITION**

**TO: SEE ATTACHED SERVICE LIST**

Please take notice that on May 8, 2014, at 2:30 p.m., the undersigned will, at the Law offices of Rudolph F. Magna, 495 N. Riverside Drive, Suite 201, Gurnee, Illinois, take the discovery deposition of Larry J. Cohn, individually and as a corporate representative for Timber Creek Homes, Inc., before a Notary Public or any other duly authorized officer in the State of Illinois.

You are instructed to bring with you the following:

1. Any and all documents relating to or purporting to show any alleged bias in the siting process or procedure in this matter, including the deliberation and decision making process engaged in by the Village of Round Lake Park ("Village") or the Round Lake Park Village Board ("Village Board") related to the Siting Application for the proposed Groot Lake Transfer Station (the "Transfer Station").

2. Any and all documents concerning or relating to any alleged lack of fundamental fairness of the siting hearing, procedure, process, or decision of the Village Board related to the Siting Application.
3. All documents which purport to show any alleged ex parte or improper contacts by anyone with the Village or Village Board concerning the Siting Application.
4. Any and all communications between TCH or its agents or attorneys, including but not limited to Mr. Larry Cohn and Mr. Michael Blazer, between any waste company, transfer station operator, or other competitor to Groot concerning the Siting Application or the siting procedures and process, including the public hearing concerning the Application.

Dated: May 6, 2014

Respectfully submitted,

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On behalf of GROOT INDUSTRIES, INC.

/s/ Richard S. Porter

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Richard S. Porter  
One of Its Attorneys

HINSHAW & CULBERTSON LLP  
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P.O. BOX 1389  
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**AFFIDAVIT OF SERVICE**

STATE OF ILLINOIS            )  
  )  
COUNTY OF WINNEBAGO      )        SS

The undersigned certifies that on **May 6, 2014**, a copy of the foregoing **Amended Notice of Deposition** was served upon the following:

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by e-mailing a copy thereof as addressed above.

  
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