

**OBJECTIONS TO CASEYVILLE TRANSFER STATION, L.L.C.'s DOCUMENT
PRODUCTION REQUESTS**

Request No. 1: Any documents that have been identified in RLF's answers to the Interrogatories propounded by CTS.

OBJECTION TO REQUEST NO. 1: Petitioner objects to the use of "RLF" and "CTS" without definition, and as to this Interrogatory being unduly burdensome and overly broad, to the extent this Request seeks documents that are already contained in the Public Record that should have been filed by the Village Board of the Village of Caseyville on or before October 9, 2014, but as of October 15, 2014, was not shown in the Illinois Pollution Control Board on-line docket as having been filed. However, assuming "RLF" is intended to reference Petitioner Roxana Landfill, Inc., "CTS" is intended to reference Caseyville Transfer Station, L.L.C., and Petitioner does not have to re-produce documents already contained in the Public Record, Petitioner will respond to Document Production Request No. 1.

Request No. 2: Any and all documents that RLF intends to present as evidence at the hearing in this appeal.

OBJECTION TO REQUEST NO. 2: Petitioner repeats and incorporates its objections to Request No. 1 as and for its objections to Request No. 2.

Request No. 3: Any and all documents RLF relies upon in support of any of the allegations in its petition for review of the site location approval.

OBJECTION TO REQUEST NO. 3: Petitioner repeats and incorporates its objections to Request No. 1 as and for its objections to Request No. 3.

Request No. 4: Any and all contracts, certificates of title, bills of sale or other documents or evidence supporting or tending to support RLF's allegation that it is so located as to be affected by the proposed Caseyville Transfer Station.

OBJECTION TO REQUEST NO. 4: Petitioner objects to Document Production

Request No. 4 as it is not being calculated to lead to admissible evidence; seeks information not relevant to this proceeding; seeks confidential, trade secret, privileged, and proprietary information; is vague, using an undefined acronym and reference to a “proposed Caseyville Transfer Station;” and is overly broad and unduly burdensome.

Request No. 5: Any and all documents RLF relied upon in answering Interrogatories.

OBJECTION TO REQUEST NO. 5: Petitioner repeats and incorporates its objections to Request No. 1 as and for its objections to Request No. 5. In addition, Petitioner objects to Request No. 5 to the extent it seeks attorney-client confidential or work-product privileged documents.

Dated: October 16, 2014

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Respectfully submitted,

ROXANA LANDFILL, INC.

By:

/s/ Jennifer J. Sackett Pohlenz

One of Its Attorneys