

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)	
)	
Complainant,)	
)	
v.)	PCB No. 12-035
)	(Enforcement – Water)
SIX M. CORPORATION Inc., an Illinois,)	
corporation, WILLIAM MAXWELL, and)	
MARILYN MAXWELL,)	
)	
Respondents.)	

NOTICE OF ELECTRONIC FILING

TO: See Attached Service List

PLEASE TAKE NOTICE that on the 13th day of October 2016, I filed with the Office of the Clerk of the Illinois Pollution Control Board this Notice of Electronic Filing and the Certificate of Service of the People's Response to Respondents' Requests to Admit Directed to People of the State of Illinois, copies of which are attached and hereby served upon you.

Respectfully submitted,

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

MATTHEW J. DUNN, Chief
Environmental Enforcement/Asbestos
Litigation Division

By: 

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Date: October 13, 2016

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**BEFORE THE POLLUTION CONTROL BOARD
OF THE STATE OF ILLINOIS**

PEOPLE OF THE STATE OF ILLINOIS))	
Complainant,)	
v.)	PCB NO. 12-35
)	(Enforcement — Water)
SIX M CORPORATION, INC., and)	
)	
WILLIAM MAXWELL,)	
Respondents.)	

COMPLAINANT'S RESPONSE TO RESPONDENTS' REQUESTS TO ADMIT

Complainant, PEOPLE OF THE STATE OF ILLINOIS ("People"), ex rel. LISA MADIGAN, Attorney General of the State of Illinois, hereby furnishes its responses to Respondents SIX M CORPORATION, INC. and WILLIAM MAXWELL's requests to admit:

1. Admit that on August 17, 2012, the People of the State of Illinois forwarded to opposing counsel in this matter a letter and computer disk of documentation regarding the LUST remediation project.

Answer:

The term "LUST remediation project" is undefined in Respondents' Requests to Admit. However, Complainant admits that former Assistant Attorney General Thomas Davis sent such a letter dated August 17, 2012 and a computer disk purportedly containing information regarding the leaking underground storage tank incident that is the subject of this litigation.

2. Admit that a true and correct copy of that letter is attached hereto as Exhibit A.

Answer:

Admit

3. Admit that the computer disk accompanying Exhibit A contained a true and correct copy of documentation regarding the LUST remediation project from the files of the Illinois Environmental Protection Agency.

Answer:

Admit

Respectfully submitted,

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

MATTHEW J. DUNN, Chief
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Litigation Division

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