

OFFICE OF THE ATTORNEY GENERAL STATE OF ILLINOIS

RECEIVED CLERK'S OFFICE

APR 0 9 2007

STATE OF ILLINOIS Pollution Control Board

. (-600)

Lisa Madigan

April 5, 2007

The Honorable Dorothy Gunn
Illinois Pollution Control Board
James R. Thompson Center, Ste. 11-500
100 West Randolph
Chicago, Illinois 60601

Re: People v. Isaacson Construction, Inc.

PCB No. 07-25

Dear Clerk Gunn:

Enclosed for filing please find the original and five copies of a Notice of Filing and Proposed Discovery Schedule in regard to the above-captioned matter. Please file the originals and return file-stamped copies to me in the enclosed, self-addressed envelope.

Thank you for your cooperation and consideration.

Very truly yours,

Kristen Laughridge Gale Environmental Bureau 500 South Second Street Springfield, Illinois 62706

(217) 782-9031

KLG/pp Enclosures

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF	·)	CLERK'S OFFICE
ILLINOIS,)	APR 0 9 2007
Complainant,)	STATE OF ILLINOIS Pollution Control Board
vs.	PCB No. 07-25 (Enforcement)	
ISAACSON CONSTRUCTION, INC., an Illinois corporation,)	
Respondent.)	

NOTICE OF FILING

To: Fred C. Prillaman

Mohan, Allewelt, Prillaman & Adami

One North Old State Capital Plaza, Ste. 325

Springfield, IL 62701

PLEASE TAKE NOTICE that on this date I mailed for filing with the Clerk of the Pollution Control Board of the State of Illinois, a PROPOSED DISCOVERY SCHEDULE, a copy of which is attached hereto and herewith 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:

KRISTEN LAUGHRIDGE GALE
Assistant Attorney General
Environmental Bureau

500 South Second Street Springfield, Illinois 62706 217/782-9031 Dated: April 5, 2007

CERTIFICATE OF SERVICE

I hereby certify that I did on April 5, 2007, send by First Class Mail, with postage thereon fully prepaid, by depositing in a United States Post Office Box a true and correct copy of the following instruments entitled NOTICE OF FILING and PROPOSED DISCOVERY SCHEDULE

To: Fred C. Prillaman Mohan, Allewelt, Prillaman & Adami One North Old State Capital Plaza, Ste. 325 Springfield, IL 62701

and the original and five copies by First Class Mail with postage thereon fully prepaid of the same foregoing instrument(s):

To: Dorothy Gunn, Clerk
Illinois Pollution Control Board
James R. Thompson Center
Suite 11-500
100 West Randolph
Chicago, Illinois 60601

A copy was also sent by First Class Mail with postage thereon fully prepaid to:

Carol Webb Hearing Officer Illinois Pollution Control Board 1021 North Grand Avenue East Springfield, IL 62794

KRISTEN LAUGHRIDGE GALE Assistant Attorney General

This filing is submitted on recycled paper.

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)	RECEIVED CLERK'S OFFICE
Complainant,	ĺ	APR 0 9 2007
vs.) No. PCB 07-25) (Enforcement	STATE OF ILLINOIS Pollution Control Board
ISAACSON CONSTRUCTION, INC., an Illinois corporation,		
•)	
Respondent.	}	

PROPOSED DISCOVERY SCHEDULE

NOW COMES Complainant, PEOPLE OF THE STATE OF ILLINOIS, and with the agreement and approval of the Respondent, ISAACSON CONSTRUCTION, INC., hereby submits the following proposed discovery schedule:

DESCRIPTION OF ACTIVITY	DUE DATE
All written discovery served	May 7, 2007
All written discovery answered	July 6, 2007
Complainant's opinion witnesses and their opinions disclosed	September 3, 2007
Respondent's opinion witnesses and their opinions disclosed	October 3, 2007
Depositions of complainant's witnesses completed	December 3, 2007
Depositions of respondent's witnesses completed	January 14, 2008
All requests to admit served	February 15, 2008
All requests to admit answered	March 15, 2008
All dispositive motions filed	April 15, 2008

Respectfully submitted,

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

MATTHEW J. DUNN, Chief Environmental Enforcement/Asbestos

' Litigation Division

KRISTEN LAUGHRIDGE GALE

Environmental Bureau Assistant Attorney General

500 South Second Street Springfield, Illinois 62706 217/782-9031 Dated: _____/