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STATE OF ILLINOIS
Pollution Control Board

March 6, 2012

Julie Webber
1013 W. Beech Street
Chillicothe, IL 61522

Illinois EPA
1021 N. Grand Ave. East
P.O. Box 19276
Springfield, IL 62794-9276

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Re: Illinois EPA v. Julie Webber
1750105005 - Stark County
SK:BOL:DLC #21
Attention: Legal Counsel

AC12-16

Dear Counsel:

Since I am the Respondent in this Administrative action, I am needing to complete some discovery in order to be eventually prepared for the upcoming hearing/trial. In looking at the Illinois Administrative Code Sec. 168.250, it seems that we are to work out an agreement. I would like to begin by taking the deposition of Jeff Port who was invited by my son to view the damage to the property, and was told what happened. I need to know what he intends to testify about, and what knowledge he has of the facts in this case. From there, I can determine if others need to be questioned.

Also, please provide a list of your witnesses, with name, address and telephone number, and the testimony they will provide at the hearing, as well as a list of all individuals who have knowledge of the facts of this incident with their addresses and telephone numbers and what information for which they have knowledge. This should include any outside consultants or experts and their addresses and telephone numbers along with their information. If you are in agreement with this discovery plan, please let me know so that we can make more definite what is to occur. If you are not in agreement, then I will file the necessary motions to get the hearing officer to issue the needed orders to begin discovery.

Thank you for your help.

Sincerely,

Julie Webber