

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

In the Matter Of:)	
)	
JOHNS MANVILLE, a Delaware corporation,)	
)	
)	
JM,)	PCB No. 14-3
)	
v.)	
)	
ILLINOIS DEPARTMENT OF TRANSPORTATION,)	
)	
)	
Respondent.)	

NOTICE OF FILING

To: See Attached Service List

PLEASE TAKE NOTICE that on May 9, 2017, I caused to be filed with the Clerk of the Pollution Control Board of the State of Illinois, *Complainant's Response to Respondent's Motion to Compel*, a copy of which is attached hereto and herewith served upon you via e-mail. Paper hardcopies of this filing will be made available upon request.

Dated: May 9, 2017

Respectfully submitted,

BRYAN CAVE LLP

Attorneys for Johns Manville

By: /s/ Lauren J. Caisman
Susan Brice, ARDC No. 6228903
Lauren J. Caisman, ARDC No. 6312465
161 North Clark Street, Suite 4300
Chicago, Illinois 60601
(312) 602-5079
Email: lauren.caisman@bryancave.com

SERVICE LIST

Evan J. McGinley
Office of the Illinois Attorney General
69 West Washington Street, Suite 1800
Chicago, IL 60602
E-mail: emcginley@atg.state.il.us

Matthew D. Dougherty
Assistant Chief Counsel
Illinois Department of Transportation
Office of the Chief Counsel, Room 313
2300 South Dirksen Parkway
Springfield, IL 62764
E-mail: Matthew.Dougherty@illinois.gov

Ellen O'Laughlin
Office of Illinois Attorney General
69 West Washington Street, Suite 1800
Chicago, IL 60602
E-mail: eolaughlin@atg.state.il.us

Illinois Pollution Control Board
Brad Halloran, Hearing Officer
James R. Thompson Center
100 W. Randolph, Suite 11-500
Chicago, IL 60601
E-mail: Brad.Halloran@illinois.gov

Illinois Pollution Control Board
John Therriault, Clerk of the Board
James R. Thompson Center
100 W. Randolph, Suite 11-500
Chicago, IL 60601
E-mail: John.Therriault@illinois.gov

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

In the Matter Of:)	
)	
JOHNS MANVILLE, a Delaware corporation,)	
)	
Complainant,)	PCB No. 14-3
)	
v.)	
)	
ILLINOIS DEPARTMENT OF TRANSPORTATION,)	
)	
Respondent.)	

COMPLAINANT’S RESPONSE TO RESPONDENT’S MOTION TO COMPEL

Complainant JOHNS MANVILLE (“JM”) hereby responds to Respondent ILLINOIS DEPARTMENT OF TRANSPORTATION’S (“IDOT”) Motion to Compel (“Motion”) as follows:

INTRODUCTION

IDOT has unnecessarily attempted to prolong this matter by demanding expansive fact and expert discovery since the Board’s issuance of its December 15, 2016 Interim Order and Opinion and continues to do so via the instant Motion to Compel. Though JM initially believed that the mandates of the Board’s Interim Order and Opinion could be satisfied merely with the production of invoices or bills showing the costs JM seeks to recover in this action, IDOT instead served on JM thirteen requests for documents, many of which are not narrowly tailored to the issues left open by the Board’s Interim Order and Opinion. For example, IDOT has asked for “all documents produced by all contractors or sub-contractors that performed site investigation or removal work for you at the Sites.” JM has spent a considerable amount of time reaching out to

contractors and consultants to obtain the requested documents and has produced these documents in the manner in which they were received.

IDOT's Motion is merely the result of IDOT's seeming lack of interest in undertaking the effort required to analyze the broad set of documents that it requested.¹ Though IDOT never explains what it means by producing documents "in the order in which they are ordinarily maintained" (*see* Motion, p. 8), JM has already done so to the best of its ability given that it has had to compile documents from numerous different sources. Nevertheless, JM herein provides a master index by which IDOT can reference the documents JM has produced, enabling IDOT to sort the documents it requested. IDOT's Motion should be denied and IDOT should not be permitted to delay the discovery and hearing schedule in this case anymore than it already has.

ARGUMENT

1. IDOT's Request For a Rule 214 Affidavit is Moot.

Prior to the filing of IDOT's Motion, counsel for JM informed IDOT's counsel that JM would be providing an affidavit of completeness pursuant to Illinois Supreme Court Rule 214. Undoubtedly, JM could not, in good faith, provide such an affidavit when it knew that its document production was not complete.

Contrary to the suggestions made in IDOT's Motion, JM informed IDOT that the documents would be late due to technical difficulties and that the documents would not be produced all at once. IDOT never objected. However, IDOT's Motion makes it seem that timing of JM's production was a surprise to IDOT. To the contrary, when JM served its written responses, it informed counsel for IDOT that "we are working on the document production, but

¹ IDOT also cannot reasonably complain that JM has produced more documents now than JM produced in the "initial/liability phase of this case" (*see* Motion, p. 3 n. 2) where IDOT could (and should) have requested the documents it now seeks during that phase and where, even then, liability in this case hinged on IDOT's conduct and ownership interest in Parcel No. 0393. Thus, it is not surprising that JM has more documents in its possession, custody, and/or control related to its investigation and removal work on the Sites than it had related to IDOT's Amstutz Project.

there are some technical issues we are dealing with. We will get you the documents as soon as we can.” The next day, JM explained to IDOT’s counsel that “[o]ur production is too large to send via email so we are working on a way to get this to you on a drive or a disc.” IDOT’s counsel responded by saying “[t]hanks for letting me know. We’re also fine with sending it via the Cloud, if that’s an easier way to produce your documents.” On the following day, JM produced its first batch of documents and stated that “[w]e are hand delivering the first batch of the document production on two flash drives. It will be coming in an envelope addressed to your attention. Please let us know when you receive it. We are working on the second batch. It contains many photos of the work and thus it is taking a long time to copy/send in electronic format. Thanks for your patience.”

The second batch of documents was then produced to IDOT on April 6, 2017 and was accompanied by the following explanatory email: “[w]e are hand delivering the second batch. It is a hard drive and has on it both what we sent you yesterday (Vol. 1) as well as the second batch (Vol. 2). There is a password and it will be on the sheet included. Please confirm receipt.” On April 17, 2017, JM supplemented its production with additional documents it had received and which largely consisted of invoices from Walker Wilcox Matousek LLP and a reproduction of AECOM with cost categories identified. IDOT’s effort to make JM into a “bad guy” here is simply unavailing. Regardless, a Rule 214 certification, subject to JM’s objections and right to supplement its production should additional documents been available to it, has now been provided to IDOT. Therefore, IDOT’s Motion in this regard should be denied as moot.

2. IDOT’s Request That JM Reproduce Documents Should Be Denied.

IDOT’s Motion claims that JM has produced documents in a “highly irregular fashion” (Motion, p. 6, ¶ 18). This is not the case. The Board’s Interim Opinion and Order identified boring areas for which IDOT is responsible. Neither JM nor its consultants kept records based

on boring locations. JM has gone to great lengths to cull voluminous documents to those related to the areas in the Board's order.

IDOT seems to think that JM has some special database or room that houses all of the documents relating to the investigation and removal activities performed over the past 19 years at the Southwest Sites and all costs associated therewith in an organized fashion or even divvied up between Site 3, Site 6 and Site 4/5. There is no such database or dataroom. If there were, JM would have provided IDOT with access to such a room. The reality is that many of the documents responsive to IDOT's requests are maintained by JM's various consultants and contractors.

As a result, JM and its contractors, including LFR/Arcadis/AECOM and David M. Peterson, PE PC, have reviewed their files for responsive documents and have then identified the documents relevant to the work and costs associated with Sites 3 and 6. The documents were then produced as sorted by custodian of the documents, which is typically how documents are produced in litigation and considered in the "ordinary course of business." What IDOT does not realize is that JM's effort to cull these records has greatly diminished the number of documents produced and has made IDOT's job and the Board's job easier. Notably, IDOT's requests for production never specified any form in which IDOT wanted documents produced or how electronically stored information should be searched for or replicated. Thus, JM produced all documents in either PDF format or native format (for Excel spreadsheets) as has been the parties' custom and practice throughout this litigation. Nevertheless, though JM is under no obligation to do so, JM has undertaken the expense and effort to provide IDOT with a Master Index of the documents produced by JM:

Bates Range	Document Category
JM 7212-14423	AECOM Custodian

	Documents
JM 14424-22095	David M. Peterson, PE, PC Custodian Documents
JM 22096-37498	Photographs
JM 37499-37732	AECOM Invoices
JM 37733-38036	Bid-Related Emails
JM 38037-38113	Soil Profile Emails
JM 38114-38374	USEPA Oversight Invoices
JM 38375-38386	Sub-Project Cost Detail Report
JM 38387-38408	Cost Reimbursement Agreement
JM 38409-38426	AT&T Invoice April 15, 2015
JM 38427-38436	Corrected AECOM Invoice
JM 38437-38492	Walker Wilcox Matousek LLP Invoices
JM 38493-38524	Waste Profile Applications
JM 38525-38758	AECOM Invoices (reproduced in color with cost category markups)
JM 38759-38772	April 13, 2017 Summary of Site 3 and 6 Costs
JM 38773-38782	April 14, 2017 Narrative Descriptions of Site 3 and 6 Invoiced Costs
JM 38783-38791	Additional LFR Invoices

JM has also served concurrently herewith two spreadsheets that represent JM's efforts to sort the AECOM Custodian Documents and David M. Peterson, PE PC Custodian Documents, both by Bates number and file category.

Likewise, JM has compiled lists which it believes arrange the invoices produced in chronological order, which is plainly not required by the rules. The following is such a listing of the LFR/Arcadis/AECOM Invoice documents:

Date	LFR/Arcadis/AECOM Invoice No.	Bates Range
February 10, 2006	55491	JM 7212
February 10, 2006	55491	JM 7213
February 10, 2006	55491	JM 7214
February 10, 2006	55491	JM 7215
February 10, 2006	55491	JM 7216

****Electronic Filing: Received, Clerk's Office 5/9/2017**

February 10, 2006	55491	JM 7217
February 10, 2006	55491	JM 7218
February 10, 2006	55491	JM 7219
February 10, 2006	55491	JM 13530
February 10, 2006	55491	JM 13563
June 20, 2007		JM 38783
June 29, 2007		JM 38784
July 27, 2007		JM 38785
August 31, 2007		JM 38786
September 28, 2007		JM 38787
November 2, 2007		JM 38788
November 2, 2007		JM 38789
December 28, 2007		JM 38790
January 25, 2008		JM 38791
March 11, 2008	88091	JM 10296-10372
March 28, 2008		JM 13731
April 15, 2008	89606	JM 11270-11317
April 25, 2008		JM 13889
May 8, 2008	90958	JM 13184-13236
June 17, 2008	93016	JM 11637-11661
June 17, 2008	93016	JM 13969
July 18, 2008	94213	JM 11857-11883
July 18, 2008	94213	JM 13992
July 25, 2008		JM 14013
August 12, 2008	95457	JM 14401-14423
August 29, 2008	96336	JM 12380-12405
August 29, 2008	96336	JM 14096
October 23, 2008	98966	JM 12671-12712
October 23, 2008	98966	JM 14335
October 24, 2008		JM 14352
November 21, 2008		JM 14399
November 24, 2008	100653	JM 13398-13433
December 28, 2008		JM 14400
January 22, 2009	103146	JM 7276-7317
January 25, 2009		JM 8049
February 17, 2009	104442	JM 7318-7343
February 22, 2009		JM 8115
March 16, 2009	105962	JM 7344-7357
March 29, 2009		JM 8513
April 21, 2009	108009	JM 7358-7367
May 3, 2009		JM 8526
May 21, 2009	109536	JM 7368-7393
May 31, 2009		JM 8783
July 5, 2009		JM 9129
July 13, 2009	112029	JM 7394-7431

****Electronic Filing: Received, Clerk's Office 5/9/2017**

August 2, 2009		JM 9344
August 24, 2009	114641	JM 7432-7448
August 30, 2009		JM 9866
September 23, 2009	116151	JM 7449-7450
October 4, 2009		JM 10136
October 22, 2009	117720	JM 7706-7733
November 1, 2009		JM 10471
November 23, 2009	119775	JM 7889-7894
November 29, 2009		JM 11330
December 20, 2009		JM 11678
February 10, 2010	308246	JM 7704 JM 11663-11677
March 10, 2010	312818	JM 7887 JM 11319-11329
April 7, 2010	315402	JM 8048
April 13, 2010	315402	JM 12506-12528
May 19, 2010	320799	JM 8114
May 20, 2010	320799	JM 13325-13342
June 1, 2010	323532	JM 8512
June 7, 2010	323532	JM 13632-13661
July 13, 2010	327871	JM 8525
July 13, 2010	327871	JM 13689-13730
August 2, 2010		JM 8782
August 3, 2010	332491	JM 13796-13820
August 31, 2010	337404	JM 9128
September 7, 2010	337404	JM 13470-13516
October 8, 2010	342065	JM 9343
October 11, 2010	342065	JM 12900-12941
November 2, 2010	347094	JM 9865
November 3, 2010	347093	JM 11885-11927
November 21, 2010		JM 10184
December 7, 2010	353104	JM 13262-13278
January 12, 2011	357910	JM 10472
January 14, 2011	357910	JM 13743-13792
February 7, 2011	362344	JM 9127
February 7, 2011	362344	JM 13823-13843
March 7, 2011	366435	JM 9342
March 7, 2011	366435	JM 13940-13950
April 5, 2011	372733	JM 9864
April 6, 2011	372733	JM 14024-14065
April 28, 2011	377785	JM 10135
May 3, 2011	377785	JM 14116-14163
June 1, 2011	384247	JM 10470
June 1, 2011	384247	JM 14178-14196
July 11, 2011	390257	JM 14206-14240

****Electronic Filing: Received, Clerk's Office 5/9/2017**

July 11, 2011	384247	JM 11318
August 3, 2011	395555	JM 11662
August 4, 2011	395555	JM 14296
August 29, 2011	400793	JM 11884
August 30, 2011	400793	JM 14253-14286
October 3, 2011	406904	JM 12505
October 5, 2011	406904	JM 13438-13461
November 3, 2011		JM 12899
November 3, 2011	412885	JM 13590-13627
December 1, 2011	418493	JM 13261
December 1, 2011	418493	JM 13672-13688
January 6, 2012	424443	JM 13321
January 6, 2012	424443	JM 11721-11757
February 8, 2012	429550	JM 7705 JM 12406-12422
February 24, 2012		JM 7888
February 24, 2012	434681	JM 12883-12898
April 3, 2012	440613	JM 8047
April 9, 2012	440613	JM 13240-13255
May 1, 2012	446308	JM 13282-13320
May 29, 2012	452260	JM 8511
June 5, 2012	452260	JM 13351-13358
June 7, 2012	37244104	JM 8055-8113
July 5, 2012	458047	JM 8524
July 13, 2012	37254201	JM 8778-8781
July 30, 2012	463508	JM 9126
August 2, 2012	463508	JM 13569-13589
August 22, 2012	469157	JM 9312
October 15, 2012	37280675	JM 11631-11635
October 25, 2012	37284135	JM 9648-9846
November 14, 2012	37290104	JM 10042-10134
December 20, 2012	37301866	JM 10400-10469
January 18, 2013	37309146	JM 11152-11267
February 14, 2013	37337583	JM 8784-8889
March 25, 2013	37327818	JM 9130-9296
April 25, 2013	37337583	JM 9345-9637
April 29, 2013	37337583	JM 37499-37506 JM 38525-38532 (color)
May 22, 2013	37344868	JM 37507-375134 JM 38533-38540 (color) Also produced as JM 9867-10032
June 14, 2013	37352067	JM 37515-37520 JM 38541-38546 (color) Also produced as JM 10185-

**Electronic Filing: Received, Clerk's Office 5/9/2017

		10291
August 20, 2013	37370125	JM 37521-37530 JM 38457-38556 (color) Also produced as JM 10507-10997
September 27, 2013	37381058	JM 37531-37536 JM 38557-38562 (color)
September 27, 2013	37381058	JM 11331-11478
October 11, 2013	37385674	JM 37537-37544 JM 38563-38750 (color)
October 17, 2013	37385674	JM 11679-11720
November 20, 2013	37395023	JM 37545-37554 JM 38571-38580 (color) JM 38427-38436 (corrected version and in color) Revised invoice produced as JM 11928-12228
December 23, 2013	37404085	JM 37555-37564 JM 38581-38590 (color) Also produced as JM 12713-12882
February 3, 2014	37414324	JM 37565-37576 JM 38591-38602 (color) Also produced as JM 12957-13183
March 14, 2014	37425097	JM 37577-37588 JM 38603-38614 (color) Also produced as JM 7451-7703
April 29, 2014	37436418	JM 37589-37596 JM 38615-38622 (color) Also produced as JM 7734-7886
June 10, 2014	37447885	JM 37597-37604 JM 38623-38630 (color) Also produced as JM 7895-8046
July 11, 2014	37455694	JM 37605-37610 JM 38631-38636 (color) Also produced as JM 8050-8054
September 2, 2014	37475770	JM 37611-37622 JM 38637 -38648 (color) Also produced as JM 8116-8510
November 20, 2014	37489528	JM 37523-37632

****Electronic Filing: Received, Clerk's Office 5/9/2017**

		JM 38649-38658 (color) Also produced as JM 8514-8523
January 9, 2015	37501030	JM 37633-37650 JM 38659-38676 (color) Also produced as JM 8527-8721
March 2, 2015	37519174	JM 37651-37660 JM 38677-38686 (color) Also produced as JM 10998-11151
June 15, 2015	37579851	JM 37661-37670 JM 38687-38696 (color) Also produced as JM 11530-11630
August 27, 2015	37617264	JM 37671-37680 JM 38697-38706 (color) Also produced as JM 11784-11856
December 28, 2015	37679934	JM 37681-37692 JM 38707-38718 (color) Also produced as JM 12423-12446
March 29, 2016	37711966	JM 37693-37702 JM 38719-38728 (color) Also produced as JM 9026-9125
April 13, 2016	37732228	JM 37703-37710 JM 38279-38736 (color) Also produced as JM 9313-9339
April 29, 2016	37741266	JM 37711-37716 JM 38737-38742 (color) Also produced as JM 9847-9863
June 14, 2016	37763387	JM 37717-37724 JM 38743-38750 (color) Also produced as JM 10137-10183
July 29, 2016	37785606	JM 37725-37732 JM 38751-38758 (color) Also produced as JM 10473-10506
September 22, 2016	37812003	JM 11479-11529
November 4, 2016	37830683	JM 11758-11782
January 20, 2017	37873931	JM 12447-12504

****Electronic Filing: Received, Clerk's Office 5/9/2017**

The following is the listing of USEPA oversight cost documents produced:

Billing Period Date	Bates Range
Summary Page	JM 38169
July 1, 2006-June 30, 2008	JM 38114-38131
July 1, 2008-June 30, 2009	JM 38288-38293
July 1, 2009-June 30, 2010	JM 38277-38287
July 1, 2010-June 30, 2011	JM 38247-38276
July 1, 2011-June 30, 2012	JM 38294-38334
July 1, 2012-June 30, 2013	JM 38218-38246
July 1, 2013-June 30, 2014	JM 38335-38374
July 1, 2014-June 30, 2015	JM 38170-38217
July 1, 2015-June 30, 2016	JM 38132-38168

The following is a listing of Walker Wilcox Matousek, LLP Invoice documents produced:

Date	Walker Wilcox Matousek Invoice No.	Bates Range
April 21, 2014	84915	JM 38450-38452
July 9, 2014	87856	JM 38479-38481
September 16, 2014	90804	JM 38486-38488
October 16, 2014	91588	JM 38437-38439
April 27, 2015	97236	JM 38453-38460
June 4, 2015	99401	JM 38466-38471

****Electronic Filing: Received, Clerk's Office 5/9/2017**

July 7, 2015	100183	JM 38475-38478
August 5, 2015	100973	JM 38482-38485
September 9, 2015	101847	JM 38489-38492
October 20, 2015	102636	JM 38440-38442
February 17, 2016	106362	JM 38446-38449
May 20, 2016	109227	JM 38461-38465
July 22, 2016	111298	JM 38472-38474

The following is a listing of the Campanella & Sons, Inc. Invoice documents produced:

Date	Invoice	Bates Range
May 31, 2015	Campanella & Sons, Inc.	JM 22095
August 12, 2015	Campanella & Sons, Inc.	JM 15350-15358
September 15, 2015	Campanella & Sons, Inc.	JM 15294-15295
October 22, 2015	Campanella & Sons, Inc.	JM 15296-15299
January 13, 2016	Campanella & Sons, Inc.	JM 15311-15318
June 29, 2016	Campanella & Sons, Inc.	JM 15325-15330
June 29, 2016	Campanella & Sons, Inc.	JM 15359-15360
June 29, 2016	Campanella & Sons, Inc.	JM 15361-15369
July 27, 2016	Campanella & Sons, Inc.	JM 15400
July 31, 2016	Campanella & Sons, Inc.	JM 15376-15384
August 4, 2016	Campanella & Sons, Inc.	JM 15370-15375
August 4, 2016	Campanella & Sons, Inc.	JM 15440-15443
September 12, 2016	Campanella & Sons, Inc.	JM 15385-15386

****Electronic Filing: Received, Clerk's Office 5/9/2017**

September 12, 2016	Campanella & Sons, Inc.	JM 15387-15399
September 12, 2016	Campanella & Sons, Inc.	JM 15455-15459
October 6, 2016	Campanella & Sons, Inc.	JM 15401-15412
October 6, 2016	Campanella & Sons, Inc.	JM 15461-15462
December 12, 2016	Campanella & Sons, Inc.	JM 15431-15439
December 12, 2016	Campanella & Sons, Inc.	JM 15445-15453

The following is a listing of the David M. Peterson, PE, PC Invoice documents produced:

Date	Invoice	Bates Range
March 16, 2015	David M. Peterson, PE, PC	JM 15348
April 20, 2015	David M. Peterson, PE, PC	JM 15300-15301
June 1, 2015	David M. Peterson, PE, PC	JM 15302-15303
July 5, 2015	David M. Peterson, PE, PC	JM 15304
August 3, 2015	David M. Peterson, PE, PC	JM 15305-15306
August 31, 2015	David M. Peterson, PE, PC	JM 15307-15308
October 5, 2015	David M. Peterson, PE, PC	JM 15309-15310
November 2, 2015	David M. Peterson, PE, PC	JM 15319-15320
November 30, 2015	David M. Peterson, PE, PC	JM 15321-15322
January 4, 2016	David M. Peterson, PE, PC	JM 15323-15324
February 1, 2016	David M. Peterson, PE, PC	JM 15331
March 7, 2016	David M. Peterson, PE, PC	JM 15332
April 4, 2016	David M. Peterson, PE, PC	JM 15333
May 2, 2016	David M. Peterson, PE, PC	JM 15334-15335

****Electronic Filing: Received, Clerk's Office 5/9/2017**

May 30, 2016	David M. Peterson, PE, PC	JM 15336
July 8, 2016	David M. Peterson, PE, PC	JM 15337-15338
August 1, 2016	David M. Peterson, PE, PC	JM 15339
September 6, 2016	David M. Peterson, PE, PC	JM 15340-15341
October 1, 2016	David M. Peterson, PE, PC	JM 15342
October 31, 2016	David M. Peterson, PE, PC	JM 15343
December 5, 2016	David M. Peterson, PE, PC	JM 15344
January 2, 2017	David M. Peterson, PE, PC	JM 15345

The following is a listing of other, miscellaneous Invoice documents produced:

Date	Invoice	Bates Range
April 15, 2015	AT&T Invoice	JM 15275-15293
June 19, 2015	Clean Cut Tree Care	JM 15430
July 6, 2016	North Shore Water Reclamation District	JM 15413-15429
August 10, 2016	North Shore Gas	JM 15349
September 23, 2016	Action Fence Contractors	JM 14486
October 14, 2016	Action Fence Contractors	JM 14487
October 14, 2016	Action Fence Contractors	JM 14490
October 27, 2016	Action Fence Contractors	JM 14480
December 6, 2016	Action Fence Contractors	JM 14424

JM has gone above and beyond to facilitate the ease of IDOT's review of the documents JM has produced, though IDOT has never reciprocated such efforts or provided such assistance

for JM in the past. Any further burden would be equally as great on JM as it would be on IDOT.
No further action by JM should be required.

CONCLUSION

WHEREFORE, Complainant JOHNS MANVILLE respectfully requests that the Hearing Officer deny IDOT's Motion to Compel.

Dated: May 9, 2017

Respectfully submitted,

BRYAN CAVE LLP

Attorneys for Complainant Johns Manville

By: /s/ Lauren J. Caisman
Susan Brice, ARDC No. 6228903
Lauren J. Caisman, ARDC No. 6312465
161 North Clark Street, Suite 4300
Chicago, Illinois 60601
(312) 602-5079
Email: lauren.caisman@bryancave.com

CERTIFICATE OF SERVICE

I, the undersigned, certify that on May 9, 2017, I caused to be served a true and correct copy of *Complainant's Response to Respondent's Motion to Compel* upon all parties listed on the Service List by sending the documents via e-mail to all persons listed on the Service List, addressed to each person's e-mail address.

/s/ Lauren J. Caisman
Lauren J. Caisman

SERVICE LIST

Evan J. McGinley
Office of the Illinois Attorney General
69 West Washington Street, Suite 1800
Chicago, IL 60602
E-mail: emcginley@atg.state.il.us

Matthew D. Dougherty
Assistant Chief Counsel
Illinois Department of Transportation
Office of the Chief Counsel, Room 313
2300 South Dirksen Parkway
Springfield, IL 62764
E-mail: Matthew.Dougherty@illinois.gov

Ellen O'Laughlin
Office of Illinois Attorney General
69 West Washington Street, Suite 1800
Chicago, IL 60602
E-mail: eolaughlin@atg.state.il.us

Illinois Pollution Control Board
Brad Halloran, Hearing Officer
James R. Thompson Center
100 W. Randolph, Suite 11-500
Chicago, IL 60601
E-mail: Brad.Halloran@illinois.gov

Illinois Pollution Control Board
John Therriault, Clerk of the Board
James R. Thompson Center
100 W. Randolph, Suite 11-500
Chicago, IL 60601
E-mail: John.Therriault@illinois.gov