# Electronic Filing: Received, Clerk's Office 2/16/2018

#### BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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)	PCB NO. 17-45
)	(Enforcement – Land)
)	
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	) ) ) ) ) )

#### **NOTICE OF SERVICE OF DISCOVERY DOCUMENTS**

To: Pollution Control Board, Attn: Clerk 100 West Randolph S., Suite 11-500 Chicago, IL 60601 (via electronic filing)

> Claire A. Manning Registration No. 3124724 205 S. Fifth Street, P.O. Box 2459 Springfield, IL 62705-2459 <u>cmannin@bhslaw.com</u>

Carol Webb, hearing Officer Illinois Pollution Board 1021 North Grand Avenue East Springfield, IL 62794 carol.webb@illinois.gov William D. Ingersoll Registration No. 6186363 205 S. Fifth Street, P.O. Box 2459 Springfield, IL 62705-2459 wingersoll@bhslaw.com

Allison F. Richard Registration No. 6325826 205 S. Fifth Street, P.O. Box 2459 Springfield, IL 62705-2459 arichard@bhslaw.com

PLEASE TAKE NOTICE that I have on February 16, 2018, served on the Respondent, the

following discovery documents in the above-referenced matter:

COMPLAINANT'S FIRST OF REQUEST FOR ADMISSION OF FACT COMPLAINANT'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS COMPLAINANT'S FIRST SET OF INTERROGATORIES TO RESPONDENT

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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: <u>s/Rachel Medina</u> Rachel Medina, #6297171 Assistant Attorney General Environmental Bureau 500 South Second Street Springfield, Illinois 62706 (217) 782-9031

Dated: February 16, 2018

## CERTIFICATE OF SERVICE

## I, Rachel Medina, certify that I have this date, February 16, 2018, served the attached

Notice of Service of Discovery Documents by e-mail as describe below to:

William D. Ingersoll BROWN, HAY & STEPHENS, LLP <u>wingersoll@bhslaw.com</u> (With complete copy of Respondent's Request For Production of Documents, Interrogatories, and Requests For Admission of Fact)

Claire Manning BROWN, HAY & STEPHENS, LLP <u>cmanning@bhslaw.com</u> (With complete copy of Respondent's Request For Production of Documents, Interrogatories, and Requests For Admission of Fact)

Allison Richard BROWN, HAY & STEPHENS, LLP <u>arichard@bhslaw.com</u> (With complete copy of Respondent's Request For Production of Documents, Interrogatories, and Requests For Admission of Fact)

Carol Webb Hearing Officer Illinois Pollution Control Board Carol.Webb@Illinois.gov

## PEOPLE OF THE STATE OF ILLINOIS,

LISA MADIGAN, Attorney General of the State of Illinois,

BY: <u>s/Rachel Medina</u> Rachel Medina Assistant Attorney General Environmental Bureau 500 South Second Street Springfield, Illinois 62706 (217) 782-9031