

ILLINOIS POLLUTION CONTROL BOARD

**RECEIVED**  
CLERK'S OFFICE

MAY 02 2003

**STATE OF ILLINOIS**  
**Pollution Control Board**

CITY OF KANKAKEE, )

Petitioner, )

vs. )

PCB 03-125

(Third-Party Pollution Control  
Facility Siting Appeal)

COUNTY OF KANKAKEE, COUNTY BOARD OF )  
KANKAKEE, and WASTE MANAGEMENT OF )  
ILLINOIS, INC. )

Respondents. )

MERLIN KARLOCK, )

Petitioner, )

vs. )

PCB 03-133

(Third-Party Pollution Control  
Facility Siting Appeal)

COUNTY OF KANKAKEE, COUNTY BOARD OF )  
KANKAKEE, and WASTE MANAGEMENT OF )  
ILLINOIS, INC. )

Respondents. )

MICHAEL WATSON, )

Petitioner, )

vs. )

PCB 03-134

(Third-Party Pollution Control  
Facility Siting Appeal)

COUNTY OF KANKAKEE, COUNTY BOARD OF )  
KANKAKEE, and WASTE MANAGEMENT OF )  
ILLINOIS, INC. )

Respondents. )

KEITH RUNYON, )

Petitioner, )

vs. )

PCB 03-135

(Third-Party Pollution Control  
Facility Siting Appeal)

COUNTY OF KANKAKEE, COUNTY BOARD OF )  
KANKAKEE, and WASTE MANAGEMENT OF )  
ILLINOIS, INC. )

Respondents. )

WASTE MANAGEMENT OF ILLINOIS, INC., )

Petitioner, )

vs. )

PCB 03-144

(Pollution Control Facility  
Siting Appeal)

COUNTY OF KANKAKEE, )

Respondent. )

MOTION FOR LEAVE TO FILE  
RESPONSE TO COUNTY OF KANKAKEE'S  
RESPONSE TO CITY'S  
MOTION TO RECONSIDER DISCOVERY RULINGS

NOW COMES the CITY OF KANKAKEE by and through Assistant City Attorney KENNETH A. LESHEN, and requesting leave of the Board to file a response to the County of Kankakee's Response to City's Motion to Reconsider Discovery Rulings, states as follows:

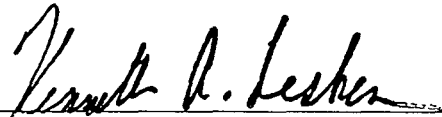
1. On April 29, 2003, the County of Kankakee filed a response to the City's Motion to Reconsider Discovery Rulings.
2. The City of Kankakee requests leave to file a response to said pleading. The County's pleading incorporates by reference two affidavits of attorneys Elizabeth Harvey and Charles Helsten which require a response by the City.

WHEREFORE, the City of Kankakee prays that this tribunal allow it leave to file said response.

Respectfully submitted,

CITY OF KANKAKEE

BY:

  
Kenneth A. Leshen  
Assistant City Attorney

Kenneth A. Leshen  
Assistant City Attorney  
One Dearborn Square, Suite 550  
Kankakee, IL 60901  
815/933-3385  
Reg. No. 03127454

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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STATE OF ILLINOIS  
Pollution Control Board

CITY OF KANKAKEE, )

Petitioner, )

v. )

COUNTY OF KANKAKEE, COUNTY )  
BOARD OF KANKAKEE, and WASTE )  
MANAGEMENT OF ILLINOIS, INC., )

Respondents. )

PCB 03-03-125

(Third-Party Pollution Control  
Facility Siting Appeal)

MERLIN KARLOCK, )

Petitioner, )

v. )

COUNTY OF KANKAKEE, COUNTY )  
BOARD OF KANKAKEE, and WASTE )  
MANAGEMENT OF ILLINOIS, INC., )

Respondents. )

PCB 03-133

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MICHAEL WATSON, )

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Facility Siting Appeal)

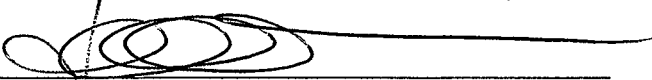
**NOTICE OF FILING**

TO: See Attached Service List

PLEASE TAKE NOTICE that on May 2, 2003, we filed with the Illinois Pollution Control Board, the attached **WASTE MANAGEMENT OF ILLINOIS, INC.'S MOTION *IN LIMINE*** in the above entitled matter.

WASTE MANAGEMENT OF ILLINOIS, INC.

By



Lauren Blair  
One of Its Attorneys

Donald J. Moran  
Lauren Blair  
PEDERSEN & HOUP  
Attorneys for Petitioner  
161 N. Clark Street  
Suite 3100  
Chicago, IL 60601  
Telephone: (312) 641-6888

**PROOF OF SERVICE**

Victoria L. Kennedy, a non-attorney, on oath states that she served the foregoing **WASTE MANAGEMENT OF ILLINOIS, INC.'S MOTION *IN LIMINE*** on the following parties by hand delivery to Hearing Officer Bradley Halloran at 100 West Randolph Street, Suite 11-500, Chicago, Illinois 60601 and by facsimile to all other parties at their facsimile number listed below on or before 5:00 p.m. on this 2nd day of May, 2003:

Ms. Dorothy M. Gunn, Clerk  
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Chicago, Illinois 60601

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Charles F. Helsten, Esq.  
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Elizabeth Harvey, Esq.  
Swanson, Martin & Bell  
One IBM Plaza  
Suite 2900  
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Chicago, IL 60611  
(312) 321-9100  
(312) 321-0990 (fax)

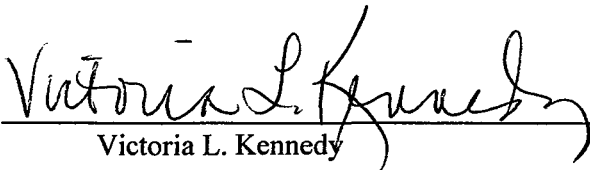
Kenneth A. Leshen, Esq.  
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Jennifer J. Sackett Pohlenz, Esq.  
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Keith Runyon  
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Bourbonnais, IL 60914  
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(815) 937-9164 (fax)

Bradley Halloran, Hearing Officer  
Illinois Pollution Control Board  
James R. Thompson Center  
100 West Randolph Street, Suite 11th Floor  
Chicago, Illinois 60601  
(312) 814-8917  
(312) 814-3669 (fax)

  
Victoria L. Kennedy