

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

TIMBER CREEK HOMES, INC.,)	
)	
Petitioner,)	
)	
v.)	PCB No. 14-99
)	(Pollution Control Facility
)	Siting Appeal)
VILLAGE OF ROUND LAKE PARK, ROUND)	
LAKE PARK VILLAGE BOARD and GROOT)	
INDUSTRIES, INC.,)	
)	
Respondents.)	

NOTICE OF FILING

PLEASE TAKE NOTICE that on March 31, 2014, there was filed electronically RESPONSE TO PETITIONER'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS FROM GROOT INDUSTRIES, INC., a copy of which is hereby attached and served upon you.

Dated: March 31, 2014 Respectfully submitted,

On behalf of GROOT INDUSTRIES, INC.

/s/ Richard S. Porter
Richard S. Porter
One of Its Attorneys

Charles F. Helsten ARDC 6187258
Richard S. Porter ARDC 6209751
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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

TIMBER CREEK HOMES, INC.,)	
)	
Petitioner)	
)	
v.)	No. PCB 2014-099
)	
VILLAGE OF ROUND LAKE PARK,)	
ROUND LAKE PARK VILLAGE BOARD)	
and GROOT INDUSTRIES, INC.,)	(Pollution Control Facility Siting Appeal)
)	
Respondents)	

RESPONSE TO PETITIONER'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS FROM GROOT INDUSTRIES, INC.

Now comes Respondent, Groot Industries, Inc. ("Groot"), by and through its attorneys, HINSHAW & CULBERTSON LLP, and in response to Petitioner, Timber Creek Homes, Inc.'s First Request for Production of Documents states as follows:

GENERAL OBJECTIONS: Groot objects to the Requests for Production, as set forth in its Objections to Petitioner's Discovery Requests, dated February 26, 2014. Groot specifically objects to these Requests to the extent that they are overbroad and seek documents unrelated to the transfer station that is the subject of this proceeding. That objection was ruled upon and sustained in the Discovery Order of Hearing Officer Halloran ("Discovery Order") dated March 20, 2014. Pursuant to the Discovery Order, the time frame for which discovery could be requested by Petitioner commences on the date that Mr. Kleszynski was retained by the Village. The Village has indicated he was retained on June 20, 2013. Petitioner has limited its Requests for Production to the period ending June 21, 2013. Therefore, Groot's Responses are limited to the period from June 20, 2013, to June 21, 2013.

1. All documents relating to or reflecting all meetings, conversations, communications and contacts between Groot and the Village of Round Lake Park (“VRLP”).

RESPONSE: Subject to and without waiving the Objections set forth above, see documents attached to the Answers to Interrogatories Bate Stamped 000001 to 000005.

2. All documents relating to or reflecting all meetings, conversations, communications and contacts between Groot and any member of the Round Lake Park Village Board (the “RLP Board”).

RESPONSE: Subject to and without waiving the Objections set forth above, see documents attached to the Answers to Interrogatories Bate Stamped 000001 to 000005.

3. All documents relating to or reflecting all meetings, conversations, communications and contacts between VRLP and Lee Brandsma.

RESPONSE: Subject to and without waiving the Objections set forth above, there are no documents responsive to this request.

4. All documents relating to or reflecting all meetings, conversations, communications and contacts between any member of the RLP Board and Lee Brandsma.

RESPONSE: Subject to and without waiving the Objections set forth above, there are no documents responsive to this request.

5. All documents relating to or reflecting all meetings, conversations, communications and contacts between VRLP and Larry Groot.

RESPONSE: Subject to and without waiving the Objections set forth above, there are no documents responsive to this request.

6. All documents relating to or reflecting all meetings, conversations, communications and contacts between any member of the RLP Board and Larry Groot.

RESPONSE: Subject to and without waiving the Objections set forth above, there are no documents responsive to this request.

7. All documents relating to or reflecting all meetings, conversations, communications and contacts between VRLP and Chicago Bridge & Iron Company.

RESPONSE: Subject to and without waiving the Objections set forth above, see documents attached to the Answers to Interrogatories Bate Stamped 000004 to 000005.

8. All documents relating to or reflecting all meetings, conversations, communications and contacts between any member of the RLP Board and Chicago Bridge & Iron Company.

RESPONSE: Subject to and without waiving the Objections set forth above, see documents attached to the Answers to Interrogatories Bate Stamped 000004 to 000005.

9. All documents relating to or reflecting all meetings, conversations, communications and contacts between VRLP and The Shaw Group and/or Shaw Environmental, Inc.

RESPONSE: Subject to and without waiving the Objections set forth above, see documents attached to the Answers to Interrogatories Bate Stamped 000004 to 000005.

10. All documents relating to or reflecting all meetings, conversations, communications and contacts between any member of the RLP Board and The Shaw Group and/or Shaw Environmental, Inc.

RESPONSE: Subject to and without waiving the Objections set forth above, see documents attached to the Answers to Interrogatories Bate Stamped 000004 to 000005.

Dated: March 31, 2014

Respectfully submitted,

On behalf of GROOT INDUSTRIES, INC.

/s/ Richard S. Porter

Richard S. Porter
One of Its Attorneys

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AFFIDAVIT OF SERVICE

STATE OF ILLINOIS)
) SS
COUNTY OF WINNEBAGO)

The undersigned certifies that on **March 31, 2014**, a copy of the foregoing **Notice of Filing Response to Petitioner's First Request for Production of Documents from Groot Industries, Inc.** was served upon the following:

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