

AUG 21 2003

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

STATE OF ILLINOIS
Pollution Control Board

PEOPLE OF THE STATE OF ILLINOIS,)
)
 Complainant,)
)
 v.)
 SKOKIE VALLEY ASPHALT, CO., INC.,)
 an Illinois corporation,)
 EDWIN L. FREDERICK, JR.,)
 individually and as owner and)
 President of Skokie Valley Asphalt)
 Co., Inc., and)
 RICHARD J. FREDERICK,)
 individually and as owner and)
 Vice President of)
 Skokie Valley Asphalt Co., Inc.,)
)
 Respondents.)

PCB 96-98

NOTICE OF FILING


TO: See Attached Service List

PLEASE TAKE NOTICE that on August 21, 2003, we filed with the Illinois Pollution Control Board "EXHIBIT A AND CORRECTION TO COMPLAINANT'S SECOND MOTION TO COMPEL RESPONDENTS, SKOKIE VALLEY ASPHALT, CO., INC., EDWIN L. FREDERICK, JR. AND RICHARD J. FREDERICK, TO RESPOND TO DISCOVERY REQUESTS", a true and correct copy of which is attached and hereby served upon you.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS,
ex rel. LISA MADIGAN,
Attorney General of the
State of Illinois,

BY:



JOEL J. STERNSTEIN
Assistant Attorney General
Environmental Bureau
188 W. Randolph St., 20th Floor
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THIS DOCUMENT IS SUBMITTED ON RECYCLED PAPER

9-15

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No. PCB 96-98

STATE OF ILLINOIS
Pollution Control Board

EXHIBIT A AND CORRECTION TO
COMPLAINANT'S SECOND MOTION TO COMPEL
RESPONDENTS, SKOKIE VALLEY ASPHALT, CO., INC.,
EDWIN L. FREDERICK, JR. AND RICHARD J. FREDERICK,
TO RESPOND TO DISCOVERY REQUESTS

Complainant, PEOPLE OF THE STATE OF ILLINOIS, by LISA MADIGAN, Attorney General of the State of Illinois, pursuant to a request from Hearing Officer Carol Sudman, hereby submits Exhibit A to its Second Motion to Compel Respondents SKOKIE VALLEY ASPHALT, CO., INC., EDWIN L. FREDERICK, JR. AND RICHARD J. FREDERICK to Respond to Discovery Requests ("Second Motion to Compel"). Pursuant to Hearing Officer Sudman's request, only one (1) copy of Exhibit A will be filed with the Board's Clerk's Office.

Exhibit A consists of all of the discovery requests that

Complainant served on Respondents on or about May 7, 2003. In order to save paper, Complainant has omitted the instructions, claims of privilege, and definitions sections from the discovery requests served on the Fredericks since those instructions, claims of privilege, and definitions are identical to those in the discovery requests to Skokie Valley Asphalt Co., Inc. Exhibit A also contains Respondents' answers to Complainant's discovery requests.

Paragraph 20 of the second Motion to Compel currently reads as follows:

20. No answers were provided to Complainant's Second Request for Production of Documents, Objects, and Tangible Things on Respondent SVA. Complainant demands that SVA provide those answers immediately.

The corrected Paragraph 20 should read as follows:

20. No answers were provided to Complainant's First Request for Admission of Facts on Respondent Edwin L. Frederick, Jr. Complainant demands that SVA provide those answers immediately.

PEOPLE OF THE STATE OF ILLINOIS,
ex rel. LISA MADIGAN,
Attorney General of the
State of Illinois,

By:



MITCHELL L. COHEN

JOEL J. STERNSTEIN

Assistant Attorney General

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Hearing Officer
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Illinois EPA
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Due to the volume of this pleading,

please contact the Clerk's Office

at

312/814-3629

to view this file.