

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PROTECT WEST CHICAGO,)

Petitioner,)

v.)

CITY OF WEST CHICAGO, WEST)

CHICAGO CITY COUNCIL, and)

LAKESHORE RECYCLING SYSTEMS,)

LLC,)

Respondents)

PEOPLE OPPOSING DUPAGE)

ENVIRONMENTAL RACISM,)

Petitioner,)

v.)

CITY OF WEST CHICAGO and)

LAKESHORE RECYCLING SYSTEMS,)

Respondents.)

PCB No: 2023-107
(Pollution Control Facility Siting Appeal)

PCB No: 2023-109
(Third-Party Pollution Control Facility
Siting Appeal)

NOTICE OF FILING

To: **See Attached Service List**

PLEASE TAKE NOTICE that on April 24, 2023, Protect West Chicago electronically filed with the Illinois Pollution Control Board, 60 E. Van Buren Street, Suite 630, Chicago, IL 60605, an original of the attached: **PROTECT WEST CHICAGO'S AGREED MOTION TO SET DISCOVERY AND BRIEFING SCHEDULE** a copy of which are attached and served upon you.

Dated: April 24, 2023

Respectfully Submitted,



Ricardo Meza
Attorney for Protect West Chicago

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CERTIFICATE OF SERVICE

I, Ricardo Meza, an attorney, certify that I have served the attached **PROTECT WEST CHICAGO'S AGREED MOTION TO SET DISCOVERY AND BRIEFING SCHEDULE**, on the below-named parties (Service List) by delivering the document to them via electronic mail on April 24, 2023.



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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PROTECT WEST CHICAGO,)	
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v.)	PCB No: <u>2023-107</u>
)	(Pollution Control Facility Siting Appeal)
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**PROTECT WEST CHICAGO’S AGREED
MOTION TO SET DISCOVERY AND BRIEFING SCHEDULE**

NOW COMES the Petitioner, Protect West Chicago, (“PWC”), by and through its attorney, Meza Law, and hereby files its Agreed Motion to Set Discovery and Briefing Schedule with the Illinois Pollution Control Board.

1) Per the April 21, 2023 Order of Hearing Officer Bradley Halloran, the parties were ordered to submit a proposed Discovery Schedule no later than April 24, 2023.

2) After consulting with counsel for Lakeshore Recycling Systems, LLC, counsel for PODER, as well as counsel for the City of West Chicago, the parties propose and have agreed on the below Discovery and Briefing Schedule in this consolidated matter:

- a. Initial Written Discovery: No later than May 5, 2023

- b. Responses to Written Discovery: Due no Later than May 26, 2023
- c. Depositions to be completed: No Later than June 23, 2023.
- d. Petitioners' Opening Brief: No Later than July 21, 2023.
- e. Response Brief: No Later than August 18, 2023.
- f. Reply Brief: No Later than September 5, 2023.

WHEREFORE, PWC and the parties in this matter, respectfully requests the PCB to enter an Order setting the above referenced Discovery and Briefing Schedule. And to order any such other and further relief as the Board deems appropriate.

Dated: April 24, 2023

Respectfully Submitted,



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Attorney for Protect West Chicago

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