STATE OF ILLINOIS) ss.	RECEIVED CLERK'S OFFICE
COUNTY OF COOK)	OCT 0 7 2002
BEFORE THE ILLINOIS I MORRY GABEL, MYRA GABEL, DON FOREMAN, MARSHA FOREMAN, KEITH PINSONEAULT and TRACY PINSO	POLLUTION CONTROL BOARD STATE OF ILLINOIS Pollution Control Board)
Complainant, vs.)))) No. PCB 03-38
THE WEALSHIRE, INC., an ILLINOIS CORPORATION. Respondent.))))))
NOTIO	CE OF FILING
Bradley P. Halloran Hearing Officer Illinois Pollution Control Board James R. Thompson Center, Suite 11-500 100 West Randolph Street Chicago, IL 60601	Mitchell S. Feinberg Chuhak & Tecson, P.C. 30 South Wacker Drive Suite 2600 Chicago, IL 60606
PLEASE TAKE NOTICE that on the Illinois Pollution Control Board Respondent attached and herewith served upon you.	day of October, 2003, there was filed with the 's Proposed Discovery Schedule, a copy of which is
	By: Ash, Anos, Freedman & Logan, L.L.C.
Bruce T. Logan Ash, Anos, Freedman & Logan, L.L.C. 77 West Washington Street Chicago, IL 60602 312-346-1389 Attorneys for Respondent	

AFFIDAVIT OF SERVICE

The undersigned, being first duly sworn on oath, deposes and says that she served the above and foregoing Notice of Filing and Proposed Discovery Schedule by mailing a copy to:

Bradley P. Halloran Hearing Officer Illinois Pollution Control Board James R. Thompson Center Suite 11-500 100 West Randolph Street Chicago, IL 60601 FAX 312-814-3669 Mitchell S. Feinberg Chuhak & Tecson, P.C. 30 South Wacker Drive Suite 2600 Chicago, IL 60606 FAX 312-444-9027

Roberta Elvera

and depositing same in the U.S. Mail Chute at 77 West Washington Street, Chicago, Illinois 60602, at 5:00 P.M. on October 7, 2003, with proper postage prepaid and by faxing a copy to the numbers indicated above on October 7, 2003.

Subscribed and sworn to before me

this 7 day of October, 2003

NOTARY PUBILIC

COUNTY OF COOK)) ss.)		RECEIVED CLERK'S OFFICE
COONTY OF COOK		ara	OCT 0 7 2003
100	STATE OF ILLING POLLUTION CONTROL W. RANDOLPH STREET, CHICAGO, ILLINOIS	BOARD SUITE 11-500	STATE OF ILLINOIS Pollution Control Board
MORRY GABEL, MYRA	FOREMAN,))	
	Complainant,)	
	VS.)) No. PC	CB 03-38
THE WEALSHIRE, INC., an ILLINOIS CORPORATION.	Respondent.))))	
		<u>)</u>	

PROPOSED DISCOVERY SCHEDULE

NOW COMES the Respondent, THE WEALSHIRE, INC., an Illinois Corporation, and proposes the following discovery schedule:

- 1. Written discovery, including a production request and interrogatories, to be completed by December 1, 2003;
- 2. Depositions of the parties, including the six (6) named Complainants and presumably Arnold Goldberg, President of The Wealshire, Inc., and Ralph Chapman, the building manager of The Wealshire operation, to be taken one per week and to be concluded by February 15, 2004;
- 3. In order to be timely, the depositions of the parties' opinion/expert witnesses must be scheduled after Respondent completes modification. The current modifications in process will

be completed by the end of October, 2003, but the air conditioning units will not be operable until June of 2004. We suggest that the initial expert witnesses' depositions be taken after a restart of the equipment which should come in mid-June of 2004 to allow for testing. We propose the depositions of both Timothy O'Neill of O'Neill Engineered Systems, Inc. and the Complainants' expert, Gregory Zak, be taken prior to July 1, 2004; that reply experts be identified by July 22, 2004, and their depositions completed by August 15, 2004.

4. It is possible during the course of discovery that other witnesses will be identified by the parties. We propose those witnesses be subpoenaed and deposed prior to March 1, 2004.

Respectfully submitted,

THE WEALSHIRE, INC., an Illinois Corporation

Ash, Anos, Freedman & Logan, L.L.C.

Bruce T. Logan
Ash, Anos, Freedman & Logan, L.L.C.
77 West Washington Street
Chicago, IL 60602
312-346-1389
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