

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

RECEIVED
CLERK'S OFFICE

JUN 02 2005

STATE OF ILLINOIS
Pollution Control Board

PEOPLE OF THE STATE OF ILLINOIS,)
)
 Complainant,)
)
 v.)
)
 THE HIGHLANDS, LLC, an Illinois limited)
 liability corporation, and MURPHY)
 FARMS, INC., (a division of MURPHY-)
 BROWN, LLC, a North Carolina limited)
 liability corporation, and SMITHFIELD)
 FOODS, INC., a Virginia corporation),)
)
 Respondents.)

PCB NO. 00-104
(Enforcement)

NOTICE OF FILING

To: Mr. Jeffrey W. Tock
 Harrington, Tock & Royse
 201 W. Springfield Avenue
 Suite 601
 Champaign, IL 61824-1550

Mr. Charles M. Gering, Esq.
 McDermott, Will & Emery
 227 West Monroe Street
 Chicago, IL 60606-5096

PLEASE TAKE NOTICE that on May 27, 2005, I mailed for filing with the Clerk of the Pollution Control Board of the State of Illinois, PROPOSED REVISED AGREED DISCOVERY SCHEDULE FOR COMPLAINANT AND RESPONDENT HIGHLANDS and PROPOSED AGREED DISCOVERY SCHEDULE FOR COMPLAINANT AND RESPONDENT MURPHY FARMS, INC., a copy of each is attached hereto and herewith served upon you.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS

LISA MADIGAN
 Attorney General of the
 State of Illinois

MATTHEW J. DUNN, Chief
 Environmental Enforcement/Asbestos
 Litigation Division

BY: 
 JANE E. McBRIDE
 Assistant Attorney General
 Environmental Bureau

500 South Second Street
 Springfield, Illinois 62706
 217/782-9031
 Dated: May 27, 2005

CERTIFICATE OF SERVICE

I hereby certify that I did on May 27, 2005, send by First Class Mail, with postage thereon fully prepaid, by depositing in a United States Post Office Box a true and correct copy of the following instruments entitled NOTICE OF FILING, PROPOSED REVISED AGREED DISCOVERY SCHEDULE FOR COMPLAINANT AND RESPONDENT HIGHLANDS and PROPOSED AGREED DISCOVERY SCHEDULE FOR COMPLAINANT AND RESPONDENT MURPHY FARMS, INC.

To: Mr. Jeffrey W. Tock
Harrington, Tock & Royse
201 W. Springfield Avenue, Ste. 601
P.O. Box 1550
Champaign, IL 61824-1550

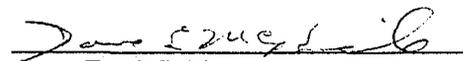
Mr. Charles M. Gering, Esq.
McDermott, Will & Emery
227 West Monroe Street
Chicago, IL 60606-5096

and the original and ten copies by First Class Mail with postage thereon fully prepaid of the same foregoing instrument(s):

To: Dorothy Gunn, Clerk
Illinois Pollution Control Board
State of Illinois Center
Suite 11-500
100 West Randolph
Chicago, Illinois 60601

A copy was also sent by sending through facsimile at 312-814-3669 and by First Class Mail with postage thereon fully prepaid

To: Mr. Brad Halloran, Hearing Officer
Illinois Pollution Control Board
State of Illinois Center, Ste. 11-500
100 West Randolph
Chicago, IL 60601


Jane E. McBride
Assistant Attorney General

This filing is submitted on recycled paper.

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**PROPOSED REVISED AGREED DISCOVERY SCHEDULE FOR
COMPLAINANT AND RESPONDENT HIGHLANDS**

NOW COMES the Complainant, PEOPLE OF THE STATE OF ILLINOIS, and with the agreement and approval of the Respondent THE HIGHLANDS, LLC, hereby submits the following proposed agreed discovery schedule for the continuing litigation between these two parties:

All parties submit responses for all outstanding written discovery	July 15, 2005
Depositions completed by all parties	November 15, 2005
All written discovery filed and served	December 15, 2005

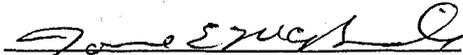
Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS

LISA MADIGAN,
Attorney General of the State of Illinois

MATTHEW J. DUNN, Chief
Environmental Enforcement/Asbestos
Litigation Division

BY:


JANE E. MCBRIDE
Assistant Attorney General

500 South Second Street
Springfield, Illinois 62706
(217) 782-9031
Dated: May 27, 2005

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**PROPOSED AGREED DISCOVERY SCHEDULE FOR
COMPLAINANT AND RESPONDENT MURPHY FARMS, INC.**

NOW COMES the Complainant, PEOPLE OF THE STATE OF ILLINOIS, and with the agreement and approval of the Respondent MURPHY FARMS, INC., hereby submits the following proposed agreed discovery schedule for the continuing litigation between these two parties:

- All parties submit responses for all outstanding written discovery July 15, 2005
- Complainant shall disclose opinion witnesses and opinions July 15, 2005
- Respondent Highlands shall disclose opinion witnesses and opinions August 15, 2005
- Depositions completed by all parties November 15, 2005

All written discovery filed and served

December 15, 2005

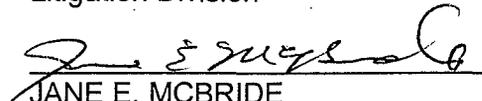
Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS

LISA MADIGAN,
Attorney General of the State of Illinois

MATTHEW J. DUNN, Chief
Environmental Enforcement/Asbestos
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