

OFFICE OF THE ATTORNEY GENERAL

STATE OF ILLINOIS

Lisa Madigan

ATTORNEY GENERAL

September 16, 2005



The Honorable Dorothy Gunn Illinois Pollution Control Board State of Illinois Center 100 West Randolph Chicago, Illinois 60601

Re:

People v. The Highlands, LLC., et al.

PCB No. 00-104

Dear Clerk Gunn:

Enclosed for filing please find the original and five copies of a NOTICE OF SERVICE OF DISCOVERY DOCUMENTS in regard to the above-captioned matter. Please file the original and return a file-stamped copy of the document to our office in the enclosed self-addressed, stamped envelope.

Thank you for your cooperation and consideration.

Very truly yours,

Jane E. McBride Environmental Bureau 500 South Second Street Springfield, Illinois 62706

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(217) 782-9031

JEM/pp Enclosures

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,	
Complainant,	
v.) PCB NO. 00-104) (Enforcement)
THE HIGHLANDS, LLC, an Illinois limited	4
liability corporation, and MURPHY	OLEO A
FARMS, INC., (a division of MURPHY-	2 7 50 VA
BROWN, LLC, a North Carolina limited	SEP 1 SPENCED
liability corporation, and SMITHFIELD	PostAre 19 200
FOODS, INC., a Virginia corporation),) Of 105
	Contly
Respondents.	
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NOTICE OF SERVICE OF DISCOVERY DOCUMENTS

To: Dorothy M. Gunn Clerk of the Board Illinois Pollution Control Board State of Illinois Center, Suite 5-11 100 West Randolph Street

Chicago, IL 60601

Brad Halloran Hearing Officer Illinois Pollution Control Board State of Illinois Center, Suite 5-11 100 West Randolph Street Chicago, IL 60601

PLEASE TAKE NOTICE that I have today served on the Respondent, MURHPY FARMS, INC., c/o Charles M. Gering, McDermott, Will & Emery, 227 West Monroe Street, Chicago, IL 60606-5096, the following discovery documents in the above-referenced matter.

- 1. COMPLAINANT'S RESPONSE TO RESPONDENT MURPHY FARMS, INC.'S FIRST REQUEST FOR PRODUCTION TO COMPLAINANT.
- 2. COMPLAINANT'S OBJECTIONS AND ANSWERS TO RESPONDENT MURPHY FARMS, INC.'S FIRST SET OF INTERROGATORIES TO COMPLAINANT.

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

ĴANE E. McBRIDE

Assistant Attorney General Environmental Bureau

500 South Second Street Springfield, Illinois 62706 217/782-9031

Dated: September 16, 2005

CERTIFICATE OF SERVICE

I hereby certify that I did on September 16, 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 SERVICE OF DISCOVERY DOCUMENTS, COMPLAINANT'S RESPONSE TO RESPONDENT MURPHY FARMS, INC.'S FIRST REQUEST FOR PRODUCTION and COMPLAINANT'S OBJECTIONS AND ANSWERS TO RESPONDENT MURPHY FARMS, INC.'S FIRST SET OF INTERROGATORIES TO COMPLAINANT

To: Charles M. Gering

McDermott, Will & Emery 227 West Monroe Street Chicago, IL 60606-5096

and the original and five copies of the NOTICE OF SERVICE OF DISCOVERY DOCUMENTS was sent by First Class Mail with postage thereon fully prepaid

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

A copy of the NOTICE was also sent 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

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

Jane E. McBride
Assistant Attorney General

This filing is submitted on recycled paper.