

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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OCT 21 2005

STATE OF ILLINOIS
Pollution Control Board

PEOPLE OF THE STATE OF ILLINOIS,

Complainant,

-vs-

PATTISON ASSOCIATES LLC, an
Illinois limited liability company,
and 5701 SOUTH CALUMET LLC, an
Illinois limited liability company,

Respondents.

No. PCB 05-181
(Enforcement – Air)

NOTICE OF FILING

PLEASE TAKE NOTICE that we have today, October 21, 2005, filed with the Office of the Clerk of the Illinois Pollution Control Board an original and fourteen (14) copies of the attached **Respondents' Request to Produce to Plaintiff**, a true and correct copy of which is hereby served upon you.

DATED: October 21, 2005

Respectfully submitted,

PATTISON ASSOCIATES, LLC and
5701 SOUTH CALUMET, LLC

By: _____

One of Their Attorneys

Neal H. Weinfield, Esq.
Allyson L. Wilcox, Esq.
Bell, Boyd & Lloyd LLC
70 West Madison Street
Suite 3100
Chicago, IL 60602
312.372.1121

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PEOPLE OF THE STATE OF ILLINOIS)

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and 5701 SOUTH CALUMET LLC, an)

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RESPONDENTS' REQUEST TO PRODUCE TO PLAINTIFF

Pursuant to Illinois Supreme Court Rule 214, you are requested to produce within twenty-eight (28) days at the offices of Bell, Boyd & Lloyd LLC, 70 W. Madison, Suite 3100, Chicago, Illinois, 60602, attorneys for respondents, the following documents, objects and tangible things within your possession or control for inspection, copying, reproduction, photographing, testing or sampling:

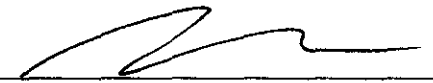
- a. the statement of any party, including but not limited to written transcripts or summaries of oral statements or conversations and recordings of oral statements or conversations;
- b. the statement or report of any other witness or knowledgeable person, including but not limited to written transcripts or summaries of oral statements or conversations and recordings of oral statements or conversations;
- c. all photographs, slides or motion pictures of the parties, of the subject property and/or the inspection or subsequent testing which were taken at any time;
- d. all incident, investigative and inspection reports pertaining to the alleged occurrence(s) alleged in your complaint at law;
- e. any and all notes, diaries, memoranda, correspondence or other documents prepared you or any person on your behalf regarding the events alleged in the complaint;

- f. any and all data and/or reports pertaining to any testing preformed at the subject site;
- g. a privilege log of all documents withheld pursuant to privilege as required under the local rules.

Respectfully submitted,

PATTISON ASSOCIATES, LLC and
5701 SOUTH CALUMET, LLC

By



One of Their Attorneys

Neal H. Weinfield, Esq.
Allyson L. Wilcox, Esq.
Bell, Boyd & Lloyd LLC
70 West Madison Street
Suite 3100
Chicago, IL 60602
312.372.1121
Firm Number: 90100

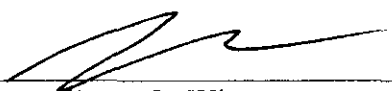
CERTIFICATE OF SERVICE

Allyson L. Wilcox, an attorney, hereby certifies that she caused a copy of the attached **Respondents' Request to Produce to Plaintiff** to be served upon:

Paula Becker Wheeler
Office of the Attorney General
188 West Randolph, 20th Floor
Chicago, IL 60601

Bradley P. Halloran
Hearing Officer
Illinois Pollution Control Board
James R. Thompson Center, Ste. 11-500
100 W. Randolph Street
Chicago, Illinois 60601

via regular U.S. Mail, postage pre-paid, on October 21, 2005.



Allyson L. Wilcox