Marek Kruk, Complainant, v. New Trier High School, Respondent PCB 20-10 (Citizens Enforcement - Noise)

Kruk Discovery schedule proposal

I'd like to start with a discovery schedule that will allow for an opportunity to review and discuss all existing reports and documents as well as follow up on outstanding requests for updates on work accomplished that have not been answered by the district.

For example, there is an outstanding request for an update in the statement made during the status call in June of 2021.

"Noise consultant is still attempting to alleviate some of the base sound around the site" In an email dated 02/04/2021, New Trier High School lawyer advised that "the district is hiring a mechanical engineer to review the sounds emitted from the dust collector and other equipment to see if there are any other steps that can be taken to further reduce the sounds from this equipment"

There are other requests for updates that have not been answered by the district.

In the first stage of the discovery schedule I'd like for the school district to address the outstanding questions that have not been answered by the district and receive all existing reports and measurements mentioned during the course of the case, as well as the ones that may not have been disclosed yet.

I believe this should be the first stage of the discovery schedule to be accomplished by 10/18/22.

It will allow to establish a base line and figure out where we stand before taking the next steps.

I'd like to have 60 days to review after all documents are submitted and questions are answered.

Marek Kruk