

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)
Complainant,)
vs.)
ISAACSON CONSTRUCTION, INC., an)
Illinois corporation,)
Respondent.)

No. PCB 07-25
(Enforcement)

RECEIVED
CLERK'S OFFICE

JUL 06 2007

STATE OF ILLINOIS
Pollution Control Board

ORIGINAL

MOTION TO FILE AMENDED DISCOVERY SCHEDULE

Complainant, PEOPLE OF THE STATE OF ILLINOIS, by LISA MADIGAN, Attorney General of the State of Illinois, and with the agreement and approval of the Respondent, ISAACSON CONSTRUCTION, INC., respectfully moves, pursuant to Sections 101.500 and 101.502 of the Board's Procedural Rules, 35 Ill. Adm. Code 101.500, 101.502 for leave to file the attached Amended Discovery Schedule.

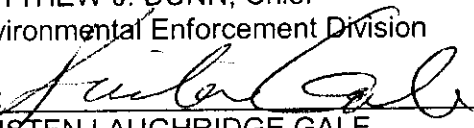
The Parties filed a Proposed Discovery Schedule on April 9, 2007 and the Hearing officer issued the Order on the Discovery Schedule on April 10, 2007. Due to the magnitude of the document requests, the parties wish to amend the discovery schedule a proposed in the attached order.

WHEREFORE, Complainant respectfully asks that this Motion to File Amended Discovery Schedule be granted.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS,
LISA MADIGAN, Attorney General
State of Illinois

MATTHEW J. DUNN, Chief
Environmental Enforcement Division

BY: 
KRISTEN LAUGHRIDGE GALE
Assistant Attorney General
Environmental Bureau

500 South Second Street
Springfield, Illinois 62706
217/782-9031
Dated: July 3, 2007

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF)
ILLINOIS,)
)
Complainant,)
)
vs.)
)
ISAACSON CONSTRUCTION, INC.,)
an Illinois corporation,)
)
Respondent.)

PCB No. 07-25
(Enforcement)

RECEIVED
CLERK'S OFFICE
JUL 06 2007
STATE OF ILLINOIS
Pollution Control Board

NOTICE OF FILING

To: Fred C. Prillaman
Mohan, Allewelt, Prillaman & Adami
One North Old State Capital Plaza, Ste. 325
Springfield, IL 62701


PLEASE TAKE NOTICE that on this date I mailed to Carol Webb, Hearing Officer, a MOTION TO FILE AMENDED DISCOVERY SCHEDULE and the AMENDED PROPOSED DISCOVERY SCHEDULE, a copy of which 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: 
KRISTEN LAUGHRIDGE GALE
Assistant Attorney General
Environmental Bureau

500 South Second Street
Springfield, Illinois 62706
217/782-9031
Dated: July 3, 2007

CERTIFICATE OF SERVICE

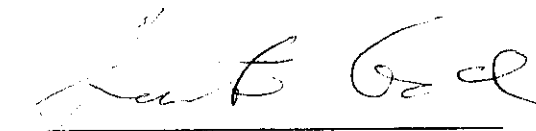
I hereby certify that I did on July 3, 2007, send by First Class Mail, with postage thereon fully prepaid, by depositing in a United States Post Office Box a true and correct copy of the following instruments entitled NOTICE OF FILING, MOTION TO FILE AMENDED DISCOVERY SCHEDULE and AMENDED PROPOSED DISCOVERY SCHEDULE

To: Fred C. Prillaman
Mohan, Allewelt, Prillaman & Adami
One North Old State Capital Plaza, Ste. 325
Springfield, IL 62701

Dorothy Gunn, Clerk
Illinois Pollution Control Board
James R. Thompson Center
Suite 11-500
100 West Randolph
Chicago, Illinois 60601

The originals were sent by First Class Mail with postage thereon fully prepaid to:

Carol Webb
Hearing Officer
Illinois Pollution Control Board
1021 North Grand Avenue East
Springfield, IL 62794



KRISTEN LAUGHRIDGE GALE
Assistant Attorney General

This filing is submitted on recycled paper.

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)
)
 Complainant,)
)
 vs.)
)
 ISAACSON CONSTRUCTION, INC., an)
 Illinois corporation,)
)
 Respondent.)

No. PCB 07-25
 (Enforcement)

RECEIVED
 CLERK'S OFFICE
 JUL 06 2007
 STATE OF ILLINOIS
 Pollution Control Board

AMENDED PROPOSED DISCOVERY SCHEDULE

NOW COMES Complainant, PEOPLE OF THE STATE OF ILLINOIS, and with the agreement and approval of the Respondent, ISAACSON CONSTRUCTION, INC., hereby submits the following amended proposed discovery schedule:

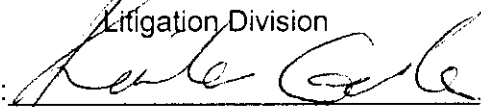
DESCRIPTION OF ACTIVITY	DUE DATE
All written discovery served	May 7, 2007
All written discovery answered	August 6, 2007
Complainant's opinion witnesses and their opinions disclosed	October 3, 2007
Respondent's opinion witnesses and their opinions disclosed	November 3, 2007
Depositions of complainant's witnesses completed	January 7, 2007
Depositions of respondent's witnesses completed	February 14, 2008
All requests to admit served	March 15, 2008
All requests to admit answered	April 15, 2008
All dispositive motions filed	May 15, 2008

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:



KRISTEN LAUGHRIDGE GALE
Environmental Bureau
Assistant Attorney General

500 South Second Street
Springfield, Illinois 62706
217/782-9031
Dated: July 3, 2007



ORIGINAL

OFFICE OF THE ATTORNEY GENERAL
STATE OF ILLINOIS

Lisa Madigan
ATTORNEY GENERAL

July 3, 2007

RECEIVED
CLERK'S OFFICE

JUL 06 2007

STATE OF ILLINOIS
Pollution Control Board

The Honorable Dorothy Gunn
Illinois Pollution Control Board
James R. Thompson Center, Ste. 11-500
100 West Randolph
Chicago, Illinois 60601

Re: ***People v. Isaacson Construction, Inc.***
PCB No. 07-25

Dear Clerk Gunn:

Enclosed for filing please find a Notice of Filing, Motion to File Amended Discovery Schedule and Amended Proposed Discovery Schedule in regard to the above-captioned matter. Please file the original and return file-stamped copies to me in the enclosed, self-addressed envelope.

Thank you for your cooperation and consideration.

Very truly yours,

Kristen Laughridge Gale
Environmental Bureau
500 South Second Street
Springfield, Illinois 62706
(217) 782-9031

KLG/pjk
Enclosures