

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS)
)
 Complainant,)
)
 v.)
)
 PACKAGING PERSONIFIED, Inc.,)
 an Illinois Corporation,)
)
 Respondent.)

PCB No. 04-016
(Enforcement)

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STATE OF ILLINOIS
Pollution Control Board

NOTICE OF DEPOSITION

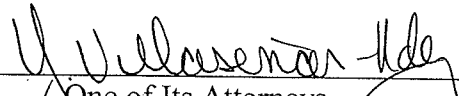
Via Facsimile and U.S. Mail

TO: Paula Wheeler
Assistant Attorney General
Environmental Bureau
69 West Washington Street, 18th Floor
Chicago, Illinois 60602
(312) 814-5388

PLEASE TAKE NOTICE that on **Wednesday, January 21, 2009**, Respondent, PACKAGING PERSONIFIED, INC., will take the discovery deposition of Gary Styzens. The deposition will take place at the offices of the Illinois Environmental Protection Agency, **1021 N. Grand Avenue East, Springfield, Illinois beginning at 1:00 p.m.** This deposition shall be recorded by stenographic means. Deponent shall provide prior to or at his deposition the documents described in Rider A.

Respectfully submitted,

PACKAGING PERSONIFIED, INC.

By: 
One of Its Attorneys

Dated: January 12, 2009

Roy M. Harsch
Drinker Biddle & Reath LLP
191 North Wacker Drive, Suite 3700
Chicago, IL 60606
(312) 569-1441 (Phone)
(312) 569-3441 (Facsmile)

RIDER A

Definitions

For purposes of this notice of deposition, the term "document" is used in the broadest sense. It refers, without limitation, to all written, printed, typed, photostatic, photographed, recorded, or otherwise reproduced communications, data compilations, or representations of every kind, whether comprised of letters, words, numbers, pictures, sounds or symbols, whether prepared by manual, mechanical, electronic, magnetic, photographic, or other means, as well as audio, video or other recordings of communications, oral statements, conversations, or events.

This definition includes, but is not limited to, any and all of the following: correspondence, notes, minutes, records, messages, memoranda, telephone memoranda, diaries, contracts, agreements, invoices, orders, acknowledgements, receipts, bills, statements, appraisals, reports, forecasts, compilations, schedules, studies, summaries, analyses, pamphlets, brochures, advertisements, newspaper clippings, tables, tabulations, financial statements, working papers, tallies, maps, drawings, diagrams, pictures, film, microfilm, microfiche, computer-stored or computer-readable data, computer programs, computer printouts, telegrams, telexes, telefacsimiles, tapes, transcripts, recordings, and all other sources or formats from which data, information, or communications can be obtained.

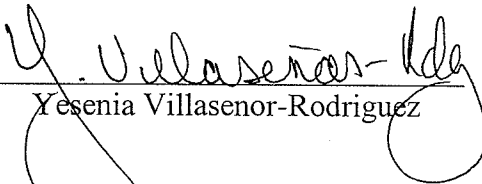
Documents to Be Produced

- A. The most comprehensive and up-to-date curriculum vitae of Gary Styzens;
- B. Any and all reports, letters, memoranda, correspondence or other written documents, expressly including but not limited to any drafts, preliminary versions or revisions of the above, which in any way set forth the opinions of Mr. Styzens relating to or economic benefit calculation;
- C. Any and all notes, memoranda, reports or other documents, expressly including but not limited to any drafts, preliminary versions or revisions of the above, prepared or relied upon by Mr. Styzens in connection with this matter;
- D. Any and all reports, documents, expressly including but not limited to any drafts, preliminary versions or revisions of the above, containing facts or data upon which Mr. Styzens' opinions, theories, conclusions, or estimates are based;
- E. Documents exhibiting how Mr. Styzens determined the economic benefit calculation; including capital and operational costs used in his report, and how such was determined;
- F. Any correspondence to and from Mr. Styzens, including other employers at the IEPA, or Attorney General's Office, or any other person or entity regarding Mr. Styzens economic benefit calculation;
- G. All reference materials, and supporting documents containing information that Mr. Styzens utilized in determining the economic benefit calculation.

CERTIFICATE OF SERVICE

I, Yesenia Villasenor-Rodriguez, an attorney hereby certify that on January 12, 2009, a copy of the foregoing Notice of Deposition was faxed and deposited in the United States mail before the hour of 5:00 p.m., postage prepaid and by facsimile to:

Paula Wheeler
Assistant Attorney General
Environmental Bureau
69 West Washington Street, 18th Floor
Chicago, Illinois 60602
(312) 814-5388



Yesenia Villasenor-Rodriguez

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