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STATE OF ILLINOIS
Pollution Control Board

OFFICE OF THE ATTORNEY GENERAL
STATE OF ILLINOIS

Lisa Madigan
ATTORNEY GENERAL

September 9, 2009

ORIGINAL

John T. Therriault, Assistant Clerk
Illinois Pollution Control Board
James R. Thompson Center, Ste. 11-500
100 West Randolph
Chicago, Illinois 60601

Re: ***People v. Tate and Lyle***
PCB NO. 09-107

Dear Clerk:

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

Thank you for your cooperation and consideration.

Very truly yours,

A handwritten signature in black ink, appearing to read "S. Janasie", written over a horizontal line.

Stephen J. Janasie
Environmental Bureau
500 South Second Street
Springfield, Illinois 62706
(217) 782-9031

SJJ/pk
Enclosures

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)
)
Complainant,)
)
vs.)
)
TATE AND LYLE INGREDIENTS)
AMERICAS, INC., an Illinois corporation,)
)
Respondent.)

PCB No. 09-107
(Enforcement-Air)

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STATE OF ILLINOIS
Pollution Control Board

NOTICE OF FILING

ORIGINAL

To: James L Curtis
Jeryl Olson
Elizabeth Leifel Ash
Seyfarth Shaw LLP
131 South Dearborn Street, Suite 2400
Chicago, IL 60603-5803


PLEASE TAKE NOTICE that on this date I mailed for filing with the Clerk of the Pollution Control Board of the State of Illinois, a JOINT 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: 
STEPHEN J. JANASIE
Assistant Attorney General
Environmental Bureau

500 South Second Street
Springfield, Illinois 62706
217/782-9031
Dated: September 9, 2009

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CERTIFICATE OF SERVICE

STATE OF ILLINOIS
Pollution Control Board

I hereby certify that I did on September 9, 2009, 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 and JOINT PROPOSED DISCOVERY SCHEDULE

To: James L Curtis
Jeryl Olson
Elizabeth Leifel Ash
Seyfarth Shaw LLP
131 South Dearborn Street, Suite 2400
Chicago, IL 60603-5803


ORIGINAL

and the original and five copies by First Class Mail with postage thereon fully prepaid of the same foregoing instrument(s):

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

A copy was also 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


STEPHEN J. JAMASIE
Assistant Attorney General

This filing is submitted on recycled paper.

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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SEP 11 2009

STATE OF ILLINOIS
Pollution Control Board

PEOPLE OF THE STATE OF ILLINOIS,)
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PCB No. 2009-107
(Enforcement Air)

ORIGINAL

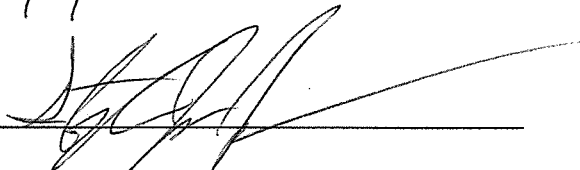
JOINT PROPOSED DISCOVERY SCHEDULE

NOW COMES Complainant, People of the State of Illinois, by attorney, LISA MADIGAN, Attorney General of the State of Illinois, and Respondent, TATE AND LYLE INGREDIENTS AMERICAS, INC., pursuant to the August 18, 2009 Order of the Hearing Officer, and propose and agree to the following discovery schedule in the above-captioned matter:

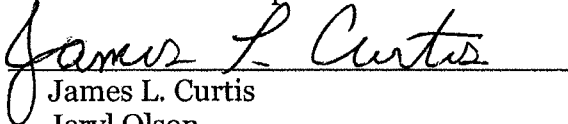
1. Written interrogatories and document requests shall be issued by the parties on or before October 15, 2009;
2. All responses to written interrogatories and document requests shall be served on or before November 15, 2009;
3. Depositions of lay or fact witness shall be completed on or before January 15, 2010;
4. Complainant's written expert witness disclosures shall be served on or before February 15, 2010;
5. Respondent's written expert witness disclosures shall be served on or before March 15, 2010;
6. Depositions of expert witnesses shall be completed on or before April 15, 2010;
7. Requests for admission of fact shall be served on or before February 15, 2010;
8. Dispositive motions shall be filed on or before May 15, 2010.

In the event there is a discovery dispute, the Hearing Officer may adjust the schedule as needed.

Date: 9/9/09

By: 

Stephen J. Janasie
Environmental Bureau
Assistant Attorney General
500 South Second Street
Springfield, Illinois 62706
Counsel for Complainant

By: 

James L. Curtis
Jeryl Olson
Elizabeth Leifel Ash
Seyfarth Shaw LLP
131 South Dearborn Street
Suite 2400
Chicago, IL 60603-5803
Counsel for Respondent