

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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|----------------------------------|---|---|
| STOP THE MEGA-DUMP, |) | |
| |) | |
| Petitioner, |) | |
| |) | |
| v. |) | PCB 10-103 |
| |) | (Third-Party Pollution Control Facility |
| COUNTY BOARD OF DEKALB COUNTY |) | Siting Appeal) |
| ILLINOIS and WASTE MANAGEMENT OF |) | |
| ILLINOIS, INC., |) | |
| |) | |
| Respondents |) | |
| _____ |) | |
| |) | |
| WASTE MANAGEMENT OF ILLINOIS, |) | |
| INC., |) | |
| |) | |
| Petitioner, |) | |
| |) | |
| v. |) | PCB 10-104 |
| |) | (Pollution Control Facility Siting |
| DEKALB COUNTY BOARD, |) | Appeal) |
| |) | (Consolidated) |
| Respondent. |) | |

REQUEST FOR PRODUCTION OF DOCUMENTS

Respondent, WASTE MANAGEMENT OF ILLINOIS, INC., ("WMII"), by and through its attorneys, PEDERSEN & HOUP, P.C., pursuant to Section 101.616 of the Pollution Control Board Procedural Rules and Supreme Court Rule 214, submits to the Petitioner, Stop the Mega-Dump ("STMD"), this request for production of documents. Documents responsive to this request are to be produced or made available for inspection or reproduction on or before August 9, 2010.

DEFINITION

"Document" or "documents" means the original or any copy of such original, and any non-identical copy of such original, of any written, recorded, or graphic material of any kind (including handwritten, printed, lithographed, duplicated, typed, or other graphic, photographic, electronic or computer-generated matter), and shall include, but not be limited to, all letters, e-mails and any attachments, correspondence, contracts, agreements, notes, reports, video or photographic memory cards or DVD copies of such cards or files, diagrams, mechanical or electrical sound records or transcripts thereof, memoranda or any notes of telephone, cell phone or personal conversations or of meetings or conferences (e.g. rallies, town hall meetings, planning meetings), minutes, transcripts, or studies.

REQUEST FOR PRODUCTION

1. Any and all documents that have been identified in STMD's answers to the Interrogatories propounded by WMII.
2. Any and all documents that have been prepared or relied upon by any witness who will testify at the hearing in this appeal.
3. Any and all documents that STMD intends to present as evidence at the hearing in this appeal.
4. Any and all documents that STMD relies upon in support of any of the allegations in its Petition for Review of Site Location Approval.

5. Any and all documents that relate to the County Board meeting on May 10, 2010.
6. Any and all documents that support or tends to support the claim that any member of the DeKalb County Board prejudged the Site Location Application.

Respectfully submitted,

WASTE MANAGEMENT OF ILLINOIS, INC.

By: 

Donald J. Moran
One of Its Attorneys

Donald J. Moran
PEDERSEN & HOUP
161 North Clark Street
Suite 3100
Chicago, IL 60601
(312) 641-6888

PROOF OF SERVICE

I, Tasha Madray, a non-attorney, on oath states that she served the foregoing Respondent's Request for Production of Documents by enclosing same in an envelope addressed to the following parties as stated below, and by depositing same in the U.S. mail at 161 N. Clark St., Chicago, Illinois 60601, on or before 5:00 p.m. on this 9th day of July, 2010:

Ms. Renee Cipriano
Ms. Amy Antonioli
Schiff Hardin LLP
233 South Wacker Drive
Suite 6600
Chicago, IL 60606

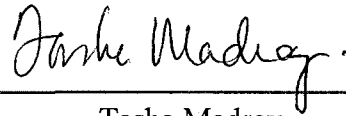
John Farrell
DeKalb County State's Attorney
Legislative Center
200 N. Main Street
Sycamore, IL 60178

Mr. Brad Halloran, Hearing Officer
Illinois Pollution Control Board
James R. Thompson Center
Suite 11-500
100 West Randolph
Chicago, IL 60601

Via Email and Regular Mail

Mr. George Mueller
Mueller Anderson, P.C.
609 Etna Road
Ottawa, IL 61350

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



Tasha Madray