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BEFORE THE
ILLINOIS COMMERCE COMMISSION

IN THE MATTER OF:)
)
RENDERED SERVICES, INC.,)
an Illinois corporation,)
)
Respondent.)
)
) No. 74 RTV-R Sub 15
)
Hearing on fitness to hold)
a Commercial Vehicle)
Relocator's License pursuant)
to Section 401 of the)
Illinois Commercial)
Relocation of Trespassing)
Vehicles Law,)
625 ILCS 5/18a-401.)

Chicago, Illinois
July 26, 2016

Met pursuant to notice at 2:30 p.m.

BEFORE:
MS. LATRICE KIRKLAND-MONTAQUE, Administrative Law
Judge.

1 APPEARANCES:

2 ILLINOIS COMMERCE COMMISSION, by
3 MS. JENNIFER ANDERSON and
4 MR. BENJAMIN BARR
5 160 North LaSalle Street, Suite C-800
6 Chicago, Illinois 60601
7 312.814.1934

8 Appearing on behalf of the Staff of
9 the Illinois Commerce Commission;

10 MR. DONALD S. ROTHSCHILD
11 835 McClintock Drive
12 Burr Ridge, Illinois 60527

13 Appearing on behalf of Rendered Services,
14 Inc.

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19 SULLIVAN REPORTING COMPANY, by
20 Christa Yan, CSR

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I N D E X

<u>Witnesses:</u>	<u>Direct</u>	<u>Cross</u>	<u>Re-</u> <u>direct</u>	<u>Re-</u> <u>cross</u>	<u>By</u> <u>Examiner</u>
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None.

E X H I B I T S

<u>Number</u>	<u>For Identification</u>	<u>In Evidence</u>
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None.

1 JUDGE KIRKLAND-MONTAQUE: By the power vested
2 in me by the State of Illinois and the Illinois
3 Commerce Commission, I now call for status hearing
4 74 RTV-R Sub 15. We are here on a status hearing on
5 the pending hearing on fitness to hold a commercial
6 vehicle relocater's license, and the respondent today
7 is Rendered Services Inc.

8 May I have appearances, please. Let's
9 start with Staff.

10 MS. ANDERSON: Thank you, your Honor.

11 My name is Jennifer Anderson. I
12 appear on behalf of the Staff of the Illinois
13 Commerce Commission. My address is 160 North LaSalle
14 Street, Chicago, Illinois, 60601. My phone number is
15 312-814-1934.

16 JUDGE KIRKLAND-MONTAQUE: Thank you.

17 MR. BARR: Good afternoon, your Honor. My name
18 is Benjamin Barr. I also appear on behalf of the
19 Staff of the Illinois Commerce Commission. My
20 address is 160 North LaSalle Street, Chicago,
21 Illinois, 60601. My phone number is 312-814-2859.

22 JUDGE KIRKLAND-MONTAQUE: Mr. Rothschild?

1 MR. ROTHSCHILD: Good afternoon, your Honor.
2 My name is Donald S. Rothschild. I appear today on
3 behalf of the respondent, Rendered Services Inc. My
4 business address is 835 McClintock Drive, Burr Ridge,
5 Illinois. I'm an attorney licensed by the Supreme
6 Court.

7 JUDGE KIRKLAND-MONTAQUE: Okay. Thank you.

8 All right. As I stated earlier, today
9 is a status hearing on the discovery that is in
10 process between the parties. And on that note, I
11 will just ask the parties to give us an update on
12 where things stand in terms of the discovery.

13 MS. ANDERSON: Thank you, your Honor.

14 Yesterday I received in the mail an
15 initial response to Staff's standard request from
16 Rendered Services. I haven't really fully been able
17 to analyze that response yet. They did produce some
18 documentation. They did make objections to several
19 requests.

20 So I will need some time to further
21 review that response and try to resolve differences
22 or make amendments to the request working with

1 Mr. Rothschild, with respect to Staff's production of
2 records in response to Rendered's requests to produce
3 and Rendered's interrogatories that were served on
4 Staff. We have made progress on getting records
5 ready for that.

6 We will require more time for rounding
7 up the final records and for me to review them once
8 the response is complete. What I would request is
9 for Staff to produce its response to Rendered on or
10 before August 19 and for your Honor to set an
11 additional status hearing maybe sometime between
12 August 22 and 31 so we can see where we are and make
13 sure the matter continues to progress.

14 JUDGE KIRKLAND-MONTAQUE: Okay.

15 Mr. Rothschild, do you have anything to add?

16 MR. ROTHSCHILD: Yes, your Honor. You know, I
17 think the status date seems reasonable to me. With
18 respect to our discovery, though we did object to a
19 number of the requests, we pretty much responded and
20 provided information to virtually everything noting
21 in one of the responses that this laundry list of
22 information that they were requesting regarding

1 towing activity is all embodied in documents. And
2 under the Supreme Court Rules, we're allowed to
3 furnish documents in lieu of creating lists and
4 responding.

5 However, the documents that are
6 responsive are in excess of 35,000 documents. And in
7 the response, I invited Ms. Anderson to my office to
8 look at them because they're too difficult to scan
9 because they're like tissue paper copies of tow
10 tickets, and I doubt she wants them sent to a copy
11 service. That would be kind of expensive.

12 So we're available by appointment to
13 give her a room or even give her some water, and she
14 can go look at our 35,000 records.

15 JUDGE KIRKLAND-MONTAQUE: Is this something
16 that can be -- and I don't know what the specific
17 request is.

18 MS. ANDERSON: Your Honor, I would ask
19 additional time to try to speak with Mr. Rothschild
20 on that issue.

21 I do agree that what he has just said
22 on the record is consistent with what he responded in

1 terms of the records potentially responsive to one of
2 the requests, the data request.

3 JUDGE KIRKLAND-MONTAQUE: Okay. So there may
4 be opportunity to work on that particular data
5 request or in some way narrow the response, some way
6 to reduce the amount of information that's required
7 in response at this point; is that true?

8 MS. ANDERSON: Yeah. I will try to consider
9 the situation and see if we can either make the
10 inspection as he proposes or reach some sort of other
11 accommodation or narrowing.

12 JUDGE KIRKLAND-MONTAQUE: Okay. All right.
13 Well, and then you're saying that you should be able
14 to produce documents per their request by August 19?

15 MS. ANDERSON: That's what I'm requesting, your
16 Honor, yes.

17 MR. ROTHSCHILD: Are we talking about documents
18 or responses to the interrogatories also?

19 MS. ANDERSON: Both.

20 MR. ROTHSCHILD: Okay.

21 JUDGE KIRKLAND-MONTAQUE: Okay.

22 MR. ROTHSCHILD: Could they be emailed to me on

1 that date? The documents, if they're not voluminous.

2 MS. ANDERSON: The interrogatories, I should be
3 able to email. The document request, I'll at least
4 be able to email the initial response pages. But if
5 the attachments are too large, I would have to mail
6 them physically.

7 MR. ROTHSCHILD: Okay.

8 JUDGE KIRKLAND-MONTAQUE: And you're saying a
9 status between the 22nd and when?

10 MS. ANDERSON: I was suggesting sometime
11 between the 22nd and the 31st.

12 JUDGE KIRKLAND-MONTAQUE: Can we do the
13 afternoon of the 30th?

14 MR. ROTHSCHILD: You know, I have this quirky
15 case where I have to take depositions at night. And
16 it's kind of throwing my schedule off. I mean,
17 literally, in the middle of the night.

18 So could we do it like on the 1st or
19 the 2nd -- actually, the 1st, would that work?

20 MS. ANDERSON: Okay. September 1st would work
21 for Staff.

22 JUDGE KIRKLAND-MONTAQUE: Okay. That's a

1 Thursday morning or afternoon?

2 MR. ROTHSCHILD: Morning is good.

3 JUDGE KIRKLAND-MONTAQUE: Okay. So this status
4 hearing shall be continued to Thursday, September 1st
5 at 10:00 a.m. And that gives Staff time, and also
6 Staff submit its responses to the interrogatory and
7 documents to Rendered by August 19th. All right. So
8 that's all for that matter.

9 (Whereupon, the matter was
10 continued to September 1, 2016,
11 at 10:00 a.m.)

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