

DIVISION OF ADMINISTRATIVE HEARINGS

FLORIDA CHAPTER OF
THE SIERRA CLUB, and
SAVE OUR SUWANNEE, INC.,

Petitioners,

DOAH Case No. 99-3096
OGC Case No. 99-1116

vs.

FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION
and SUWANNEE AMERICAN CEMENT
COMPANY, INC.

Respondents.

**PETITIONERS' NOTICE OF TAKING DEPOSITION DUCES TECUM
OF JOSEPH KAHN, P.E.**

PLEASE TAKE NOTICE that the undersigned attorney will take the deposition of
JOSEPH KAHN, P.E. upon oral examination before a court reporter authorized by law to take
depositions at:

the offices of
Accurate Stenotype Reporters, Inc.
100 Salem Court
Tallahassee, Florida 32301
(850) 878-2221

on **Friday, February 4, 2000**, at **3:00 p.m.** and continuing until completed. The deposition is
being taken for the purpose of discovery, for use at trial, or both of the foregoing, or for such
other purposes as authorized by law and the Florida Rules of Civil Procedure.

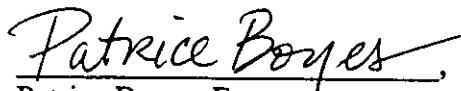
At the time that the deponent appears at the aforementioned date and time he shall have
with him the following:

1. Current resume or curriculum vitae, including a publication list.

2. All documents, memos, worksheets and maps relating to the analysis of possible mercury impacts from the proposed facility.
3. All documents, memos, worksheets, data and/or maps you have reviewed or relied upon since the November 1999 issuance of the Department's Notice of Intent to Issue an air permit to Suwannee American Cement Co., Inc.

Respectfully Submitted,

BOYES & ASSOCIATES, P.A.



Patrice Boyes, Esq.

Attorney for Petitioners

Fla. Bar No. 892520

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602 S. Main Street

Gainesville, Florida 32601

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing **Notice of Taking Deposition Duces Tecum** was furnished by facsimile and U.S. Mail on this 28th day of January 2000, to:

W. Robert Vezina, III, Esq.,
Mary M. Piccard, Esq.
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Patrice Boyes, Attorney