



ANM 4/9 *name change 3/9* *CP 4/9*

Illinois Department of Transportation

Division of Highways/District 1
201 West Center Court/Schaumburg, Illinois 60196-1096

BUREAU OF LAND ACQUISITION

Route: US 6

Location: US 45 to 94th Avenue

County: Cook

Job No.: R-90-003-05

Parcels: 0FZ0034 and 0FZ0035

April 6, 2015

Village of Orland Park
14700 S. Ravinia Avenue
Orland Park, Illinois 60462
Attn: Ms. Barb O'Brien

Dear Ms. O'Brien:

Enclosed please find an invoice from Okrent Kisiel Associates, Inc., Invoice Number C0315F dated March 3, 2015 in the amount of \$500.00. This invoice was submitted by Amanda Ripp, Special Assistant Attorney General and is now being forwarded to the Village of Orland Park for payment. The invoice covers the expense of eminent domain proceedings for the above-referenced parcels.

Please submit your remittance directly to Okrent Kisiel Associates, Inc., with a copy to attorney Amanda Ripp of Walker, Wilcox Matousek LLP. *Also, please send a copy of your remittance to Ms. Sheila Derka (IDOT).*

Should you have any questions or require additional information, please do not hesitate to contact Ms. Sheila Derka, Local Agency Acquisition Coordinator, at (847) 705-4291.

Very truly yours,

John Fortmann, P.E.
Deputy Director of Highways
Region One Engineer

A handwritten signature in black ink that reads "Jose Rios". A small circle with a question mark is drawn next to the signature.

By:
Jose Rios
Acting Bureau Chief of Land Acquisition

Enclosure

cc: Ms. Sheila Derka (w/o encl.)
Ms. Amanda Ripp (w/o encl.)

OKRENT KISIEL
ASSOCIATES INC.

INVOICE

DATE MARCH 3, 2015

TO: **AMANDA RIPP, Esq.**
WALKER WILCOX MATOUSEK, LLP
SUITE 3200
ONE NORTH FRANKLIN ST.
CHICAGO, IL 60606

RE:

Petey's II: County: Cook; Job No.: R90-003-05
Parcels: OFZ0034 A&B TE-A&B and Revised OFZ0035

KISIEL

Jan. 5: Report Draft: research, H&BUteardown examples (0.5 hrs)
Feb 9: Report Draft: revise (2.0 hrs)

DIRECT LABOR

G. Kisiel	2.50	\$200.00	\$500.00
-----------	------	----------	----------

TOTAL LABOR \$500.00

REIMBURSABLE EXPENSES

As per attached receipts (+15% handling fee):

In-house color laser and/or photo print output, per summary

Download(s) to Compact Disk

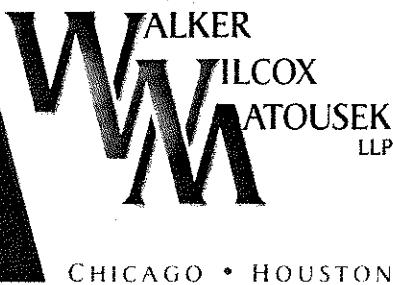
TOTAL DUE THIS INVOICE \$500.00

Job Number: 3847

Invoice Number: C0315F

TERMS: DUE UPON RECEIPT

FEIN: 36-3930975



FOUNDEERS *

William P. Bila
Robert P. Conlon
Edward P. Gibbons
Celeste M. King⁺
Gary L. Lockwood
Paul F. Matousek
David E. Walker
Mark D. Wilcox^a

RECEIVED

APR 02 2015

LAND ACQUISITION

March 27, 2015

Amanda Ripp
Tel: 312-244-6782
Fax: 312.244.6800
ARipp@wwmlawyers.com

Jose Rios
District One Bureau Chief
BUREAU OF LAND ACQUISITION
Illinois Department of Transportation
Division of Highways/District 1
201 West Center Court
Schaumburg, Illinois 60196-1096

Re: *IDOT v GreatBanc Trust Co., as Trustee, et al.*
Case No.: 06 L 50813
Route: US Route 6/US Route 45 (Orland Park, IL)
County: Cook
Job No.: R90-003-05
Parcels: OFZ0034 A&B TE-A&B and OFZ0035
Petey's Restaurant

Dear Mr. Rios:

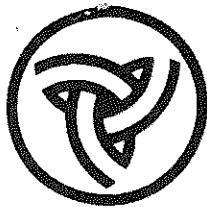
Enclosed is Invoice No. C0315F dated March 3, 2015 in the amount of \$500.00 from Okrent Kisiel Associates Inc. This invoice is for professional services rendered in connection with the acquisition of the above-referenced parcel. Also enclosed is the report referenced in the invoice.

I have approved this invoice for payment. Please call with any questions or concerns regarding the enclosed.

Very truly yours,

WALKER WILCOX MATOUSEK LLP

Amanda Ripp



Illinois Department of Transportation

Division of Highways/District 1
201 West Center Court/Schaumburg, Illinois 60196-1096

BUREAU OF LAND ACQUISITION

Route: US 6

Location: US 45 to 94th Avenue

County: Cook

Job No.: R-90-003-05

Parcel: 0FZ0035

March 2, 2015

Village of Orland Park
14700 S. Ravinia Avenue
Orland Park, Illinois 60462
Attn: Ms. Barb O'Brien

Dear Ms. O'Brien:

Enclosed please find an invoice from Christopher B. Burke Engineering, Ltd., Invoice Number 120604 dated February 5, 2015 in the amount of \$378.00. This invoice was submitted by Amanda Ripp, Special Assistant Attorney General and is now being forwarded to the Village of Orland Park for payment. The invoice covers the expense of eminent domain proceedings for the above-referenced parcel.

Please submit your remittance directly to Christopher B. Burke Engineering, Ltd., with a copy to attorney Amanda Ripp of Walker, Wilcox Matousek LLP. *Also, please send a copy of your remittance to Ms. Sheila Derka (IDOT).*

Should you have any questions or require additional information, please do not hesitate to contact Ms. Sheila Derka, Local Agency Acquisition Coordinator, at (847) 705-4291.

Very truly yours,

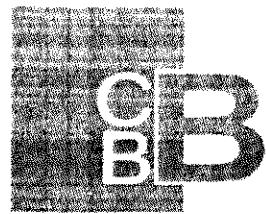
John Fortmann, P.E.
Deputy Director of Highways
Region One Engineer

By: A handwritten signature in black ink, appearing to read "Jose Rios".
Jose Rios
Acting Bureau Chief of Land Acquisition

Enclosure

cc: Ms. Sheila Derka (w/o encl.)
Amanda Ripp, Esq. (w/o encl.)

Invoice



Amanda Ripp
Walker, Wilcox, & Matousek, LLP
One North Franklin
Suite 3200
Chicago, IL 60606

February 5, 2015
Invoice No: 120604

Project 01.R060583.00004 IDOT v GreatBanc Trust Company (US Rts. 6 & 45 in Orland Park)
Job No.: R90-003-05: Parcel OFZ0035; Services included finalizing Petey's Property Opinion Document.

Professional Services from January 1, 2015 to January 31, 2015

Professional Personnel

	Hours	Rate	Amount
Environmental Resource Specialist V	2.00	189.00	378.00
Totals	2.00		378.00
Total Labor			378.00
			TOTAL THIS INVOICE
			\$378.00

Approved: Amanda Ripp
Special Asst. Atty. General

PLEASE REMIT PAYMENT TO:
CHRISTOPHER B. BURKE ENGINEERING, LTD.
DEPT. 20-8051
P.O. BOX 5998
CAROL STREAM, IL 60197-5998



CHICAGO • HOUSTON

FOUNDRERS *

William P. Bila
Robert P. Conlon
Edward P. Gibbons
Celeste M. King*
Gary L. Lockwood
Paul F. Matousek
David E. Walker
Mark D. Wilcox*

RECEIVED

FEB 25 2015

LAND ACQUISITION

February 18, 2015

Amanda Ripp
Tel: 312-244-6782
Fax: 312.244.6800
ARipp@wwmlawyers.com

Jose Rios
District One Bureau Chief
BUREAU OF LAND ACQUISITION
Illinois Department of Transportation
Division of Highways/District 1
201 West Center Court
Schaumburg, Illinois 60196-1096

Re: *IDOT v GreatBanc Trust Co., as Trustee, et al.*
Case No.: 06 L 50813
Route: US Route 6/US Route 45 (Orland Park, IL)
County: Cook
Job No.: R90-003-05
Parcels: OFZ0034 A&B TE-A&B and OFZ0035
Petey's Restaurant
WWM File No.: 901982.011

Dear Mr. Rios:

Enclosed is Invoice No. 120604 dated February 5, 2015 in the amount of \$378.00 from Christopher B. Burke Engineering, Ltd. This invoice is for professional services rendered in connection with the acquisition of the above-referenced parcel. Also enclosed is the report referenced in the invoice.

I have approved this invoice for payment. Please call with any questions or concerns regarding the enclosed.

Very truly yours,

WALKER WILCOX MATOUSEK LLP

Amanda Ripp

Memorandum

January 5, 2015

To: Amanda Ripp – Walker, Wilcox, Matousek, LLP
From: Jedd Anderson, Jeff Julkowski, and Travis Parry – CBBEL
Michael Mondus – Spaceco, Inc.

Subject: Development Potential Opinions for
IDOT v GreatBanc Trust Co., as Trustee, et al. (Petey's Site)
Orland Park, Cook County, IL
CBBEL Project No. 060583.00002

The following memorandum provides our opinions regarding the development potential of the above referenced site as of the date of valuation August 17, 2006. The before acquisition parcel covers 37.075 acres, and the after acquisition parcel covers 35.063 acres. The parcel is located at the southwest corner of US Route 45 (LaGrange Road) and US Route 7 (159th St.), Orland Park, Cook County, Illinois. Geographically the site is found in Section 21, Township 36 North, Range 12 East of the 3rd Principal Meridian.

The following were evaluated:

- Local development regulations
- Site access
- On and offsite utilities
- Stormwater management (flood plain, depressional storage and detention)
- Wetland and Environmental
- Soil suitability
- Survey

A list of all documents reviewed to form the basis of our following opinions is provided in Attachment A.

Additionally, we were asked to review improvements made to Petey's restaurant and to determine if the completed renovations were all necessary as a result of the taking. We also were asked to determine if the costs of the building improvements were in line with expectations.

The evaluation was to consider development potential of the site for two scenarios: "Before Acquisition" and "After Acquisition". We initially were also to consider two types of developments for the before and after scenarios; multi use (commercial and residential) and commercial. However, due to our understanding of stormwater issues, it was determined that one stormwater management layout for the before and after condition would cover both types of uses, and therefore it was unnecessary to develop two different use types for the before and after development scenarios. Due to reasons to be explained within the wetland section of this memorandum below, two before and two after scenarios are considered based on issues related to US Army Corps of Engineers jurisdiction of the wetlands.

Wetland Issues

Wetland Delineation

The subject property contains three wetland areas. As shown on Exhibits 1-4, Wetlands A and B are located on the west property line and extend west of the property onto the Costco Property located two properties to the west. Wetlands A and B are actually part of a larger offsite wetland. Wetland C is located entirely within the subject property. In August of 2005, JF New completed a wetland delineation report on behalf of AIG Properties, Ltd. Additional delineations of the property have been completed after August 2006 which identified similar wetland limits. We have assumed for the purposes of this document that the JF New Report would have been used by a potential developer on August 17, 2006. JF New identifies Wetland A as being +/-0.76 acres, Wetland B as +/-1.43 acres and Wetland C +/-1.81 acres; the total area of onsite wetland being 4.0 acres.

Wetland Permitting Issues

The following discusses the wetland permitting issues which, in our opinion, would be required for the site. Permitting requirements are driven by the jurisdiction of reviewing agencies. For the subject site, two agencies potentially have jurisdiction and permitting requirements, the Village of Orland Park and the US Army Corps of Engineers.

US Army Corps of Engineers (USACE)

The following provides a background on the history of the onsite wetlands USACE jurisdictional status.

- September 2004: The U.S. Army Corps of Engineers (USACE) issued a Jurisdictional Determination (JD) to the Catholic Bishop of Chicago finding that the offsite portion of Wetland A/B located on the current Costco property to the west to be Non-Jurisdictional isolated wetland. The Corps determined that the Costco site had an isolated wetland that did not have a surface connection to a navigable water of the US. Because the wetland is not under USACE jurisdiction, no USACE permit was required to develop the Costco project. This JD did not specify an expiration date. Current JD's issued are explicitly stated to be for a five year period. However, if 5 years was considered assumed at the time this JD was issued, this JD would have covered the two subsequent JD's issued for the adjoining properties. JD number LRC-2004-13021 (200400921).
- 2006: Construction of Costco begins and offsite portions of Wetland A/B were filled and excavated to create the Costco stormwater detention facility.
- May 24, 2006: A jurisdictional determination is issued by the USACE for the Chermak property located between the Costco and subject properties. The USACE finds that the offsite portion of Wetland 1 (A and B) is USACE jurisdictional, contradicting the September 2004 jurisdictional determination completed for the Catholic Bishop property (Costco). JD number LRC-2006-623.
- July 23, 2008: A jurisdictional determination is issued by the USACE for the subject property on behalf of The Shalvis Group. The USACE finds that the onsite portion of Wetland 1 (A and B) is USACE jurisdictional, contradicting the September 2004

jurisdictional determination completed for the Catholic Bishop property (Costco). JD number LRC-2008-100.

- December 7, 2010: A meeting was held with the USACE to discuss the jurisdictional determinations issued because the contradicting documents affect development of the Chermak and the subject property which was the subject of the 2008 determination. Based on a December 7, 2010 meeting with the USACE, it is likely that a new jurisdictional determination would be issued that would uphold the September 2004 Jurisdictional Determination issued to the Catholic Bishop of Chicago. If new jurisdictional determination requests were made for the Chermak and subject properties, the 2 previous determinations would likely be reversed and new jurisdictional determinations would likely be issued finding that the onsite wetlands are not jurisdictional and do not fall under USACE Section 404 Clean Water Act regulations.

USACE Summary

The USACE jurisdictional determinations from 2006 and 2008 contradict the determination issued in 2004. Site plans were prepared by potential purchasers of the subject property that assumed Wetlands A and B were USACE jurisdictional and avoided, and or minimized the impact to those wetlands. For example:

- Atwell-Hicks, Inc prepared a plan dated July 23, 2004 on behalf of Wal-Mart that impacted Wetland A but avoided Wetland B.
- National Survey and Engineering prepared a plan on behalf of "The Shoppes at Orland Park" dated December 8, 2006 that avoided all impact to Wetlands A and B.

Consequently, we developed site development plans assuming under one scenario that the wetlands would be considered USACE jurisdictional, and under the another scenario that the wetlands would not be jurisdictional. Unless a developer appealed a jurisdictional determination issued for the Chermak or subject property, it is possible that wetlands A and B (2.19 acres) would have been avoided by the site plans prepared, and thus reduced the total net developable area. If however, a determination was appealed, the wetlands would likely have been reclassified as non-jurisdictional and would not have required a USACE permit to be impacted. Therefore, to cover those scenarios, both situations were considered in the before and after acquisition development plans.

Village of Orland Park (VOP)

Regardless of the USACE jurisdiction, the wetland areas are regulated under Section 6-413 of the Village of Orland Park's Land Development Code. Under VOP Code any impact within 50' of a wetland area requires a Special Use Permit from the Village. Wetland impacts are allowable provided that the impacts are mitigated. Mitigation for wetland impacts is completed on a functional basis and the Code has no written or spelled out replacement ratio.

In our opinion, the onsite wetlands could be used to provide stormwater management provided that the stormwater management areas could be maintained as wetland and the floristic and functional quality be maintained or improved as compared to the original wetlands. In our opinion, even though acre for acre replacement of directly impacted wetland is not specifically required in the Code, based on our past experience with the Village on similar projects, we believe that 1:1 replacement of acreage should be expected

if the wetlands are used to provide stormwater management. This acreage could be provided within the stormwater management basin(s) provided that wetland vegetation can be shown to be viable and replace the impacted functions. The VOP would require submittal and approval of a wetland maintenance and monitoring plan and performance standards.

For preserved wetlands, the VOP requires a 50' buffer be provided, but the VOP will allow encroachment within the buffer provided that the impacted buffer functions are mitigated through the installation of native vegetation and/or best management practices to protect water quality and habitat value, and provides a restoration and management plan.

Exhibits 1 and 3 provide the proposed stormwater management basin layouts that contain the proposed mitigated wetland areas if Wetlands A, B and C are impacted. In that situation 4 acres of wetland is impacted by the project and the basin provides four acres of wetland mitigation.

Exhibits 2 and 4 provide the proposed stormwater management basin layout assuming only Wetland C is impacted. In these scenarios, 1.81 acres of mitigation would be provided in the detention basins.

Soils

On site soil conditions were reviewed to determine suitability of the soils for development purposes. Based on our review of the soil survey the following soils are found on site.

- 194C2 Morley Silty Loam, 5-10% Slopes
- 232 Ashkum Silty Clay Loam - Hydric
- 235 Bryce Silty Clay - Hydric
- 298 Beecher Silt Loam
- 320C3 Frankfort Silty Clay Loam, 4-6% Slopes
- 531C2 Markham Silt Loam, 5-10% Slopes
- 903 Muskego and Houghton Mucks – Hydric

As documented in the list above, three of the onsite soils are considered to be hydric soils. Hydric soils are soils that are typically wetland during a portion or all of the year and typically support wetland vegetation.

Based on our past experience with similar projects and soils, the listed soils are typical for this region and do not present a significant or note worthy challenge to development. Developers encountering the hydric soils would likely undercut the material to remove the unsuitable soils and back fill with appropriate fill material. Based on review of the soil survey, historic aerial photos and other documentation, it does not appear that the unsuitable soils are wide spread or deep. In our opinion, the onsite soils do not limit site development. Some additional earthwork expense may be necessary to handle the wet hydric soils, but this handling of material would be typical for other similar sized developments, and does not represent an extraordinary expense.

Phase 1 and 2 Environmental Site Assessment Summary

We were provided copies of the following Phase I and II Environmental Site Assessments completed on the property.

- December 30, 2004 – Phase I Environmental Assessment (EA), prepared by The English Company (TEC)
- February 3, 2005 – Limited Subsurface Investigation, prepared by The English Company as a follow up to their Phase 1 EA.
- July 28, 2005 – Phase I Environmental Site Assessment, prepared by Giles Engineering Associates, Inc.
- January 12, 2006 Draft Date – Phase II Environmental Site Assessment Report, prepared by Weaver Boos Consultants, Inc (WBC).

The northeast corner of the property was found to have contamination of certain constituents in excess the Illinois Environmental Protection Agency Tiered Approach to Corrective Action Objectives (TACO). The site appears to either have been impacted by the operation of gasoline stations on site between 1932 through 1968 based on lease agreements, or due to gasoline stations operated on nearby properties. The TEC and WBC reports suggest completing additional evaluation of the northeast corner of the site to clearly delineate the limits of contamination and confirm that no underground storage tanks are present.

In our opinion, any development of the northeast corner of the property must undertake these studies and complete remedial activities as required under state and federal regulations. In our opinion, based on the reports reviewed, these contaminants do not prevent possible development of the site. Their presence would result in additional cost to evaluate and remediate, as necessary.

Utilities

Sanitary Sewer

Prior to the right of way acquisition there was an existing 12" sanitary sewer located along the south property line that drains west and then north along the west property line where it increases to a 15" diameter sewer and then drains west in the south right-of-way of LaGrange Road. This sewer then drains west in the 159th Street right-of-way and connected to a 42" diameter Metropolitan Water Reclamation District interceptor sewer west of the Ravinia Drive intersection. There also exists an 8" diameter sanitary sewer along the north property line in the south right-of-way of LaGrange Road. This sewer flows west and is also connected to the 42" diameter Metropolitan Water Reclamation District interceptor sewer in the 159th Street right-of-way.

Based on the topography of the site and depth of the existing 12" and 15" diameter sanitary sewers that are adjacent to the property, this property can be serviced with gravity sewers by on-site sanitary sewer extensions sized for the expected land use. Based on discussion with the Village's Public Works Department the existing sewers have adequate capacity to accept the flows from the property based on the expected land uses.

After the right of way acquisition, sanitary sewers surrounding the site did not change, and service to the property would remain in the same condition that existed prior to the right of way acquisition.

Watermain

Prior to the right of way acquisition there was an existing 16" diameter watermain located along the east side of the property in the west right-of-way of LaGrange Road. At the 159th Street Intersection, the 16" main travels west for approximately 220' and then crosses under 159th Street and then runs west in the north right-of-way of 159th Street.

Based on discussions with the Village's Public Works Department the existing 16" main has sufficient capacity to handle water demands from the expected land uses on the property without requiring off-site extensions or upgrades. The property would be required to loop any new on-site watermains and connect into the existing mains on 159th Street and LaGrange Road. In addition the property would be required to construct an on-site 12" diameter watermain either through the development or across the frontage of 159th Street and stub it at the northwest corner of the property for future extension to the west.

After the right of way acquisition the watermains surrounding the site did not change and service and required looping on the site would remain in the same condition that existed prior to the right of way acquisition.

Site Access

The property is located at the southwest corner of 159th Street and LaGrange Road. Both roadways are under the jurisdiction of the Illinois Department of Transportation (IDOT) and subject to IDOT requirements regarding access. The intersection of 159th Street and LaGrange Road was signalized before and after the right of way acquisition. The intersection of 161st Street and LaGrange Road, located just to the south of the property, is not currently signalized, but was planned to be both before and after the right of way acquisition.

Based on our review of the 2005 agreements between the Village of Orland Park and Costco, and the Village of Orland Park and Summit Development, and the development plans for both projects, the Village had contemplated that 161st Street would be extended west along the south side of the property. This road would connect to the Ravinia Avenue extension that was constructed as part of the Costco development to the west and the 161st Street extension constructed to the south by Summit. The intersection of Ravinia Avenue and 159th Street would also be signalized. 161st Street would be under the jurisdiction of the Village of Orland Park and was contemplated to be a four lane roadway with a landscape median in a 100' right-of-way.

Prior to the right of way acquisition, LaGrange Road was a four lane roadway with a raised center median. It is not likely that IDOT would have allowed another full access to LaGrange Road given the approximate 1,400' spacing between the 159th and 161st Street intersections and because the property is adjacent to the other signalized intersections. It is reasonable to assume that the property would be permitted one right-in/right-out access driveway along the LaGrange Road frontage.

The approximate 1,900' spacing between the signalized intersections on 159th Street at Ravinia Avenue and LaGrange Road would probably not allow enough spacing to permit an additional full access to this property along the 159th Street frontage. However, it is possible that IDOT might have allowed full access to this property from 159th Street since the property to the north has full access and it appears that channelization at the full access could be provided without negatively impacting the existing turn lanes at the LaGrange Road intersection. It is unlikely however, that IDOT would allow this full access to be signalized, in that it is only 570' west of the intersection of LaGrange Road.

Any access requests would require permitting with IDOT, which would have required preparation of a Traffic Impact Study (TIS) that would have to demonstrate that the projected site traffic could be accommodated on the adjacent roadway network. The TIS would also review what, if any, roadway improvements at the proposed entrances and adjacent intersections might be required to accommodate projected traffic volumes. In addition it is IDOT policy, as part of a permit application request, to require that additional right of way be dedicated to accommodate any roadway improvements that the project requires. In addition they will also request that sufficient right of way be dedicated or set aside for future roadway improvements.

After the right of way acquisition, access to the property is anticipated to remain the same as the before acquisition condition since the surrounding intersections have not been modified such that they negatively impact access to the property or change the likely access scenarios that existed prior to the right of way acquisition.

Stormwater Management

Stormwater detention must be provided for the development area according to the requirements of the Village of Orland Park's ordinances. The key criteria that apply to the subject site are the allowable release rate and depressional storage mitigation. As of the date of valuation, the allowable release rate for developed areas was 0.04 cfs/acre and 0.15 cfs/acre for the 2- and 100-year storm events, respectively. Also, existing depressional storage must have been maintained or replaced at a 1:1 ratio in the site's detention storage facility.

Depressional Storage

There is an existing depressional storage area located on the west end of the site. This depressional area is contiguous to a larger depressional storage area that encumbers several adjacent properties. One of the adjacent encumbered properties (Costco site) incorporated its detention storage facility into the depressional storage area. The high water level (HWL) of the Costco detention basin, which was constructed before the date of valuation of the subject site, serves as the existing HWL for the depressional storage on the subject site. This elevation is 690.5 ft. Any existing depressional storage volume on the subject site below this elevation that will be filled must be mitigated in the site's detention facility. This volume was quantified to be 0.5 ac-ft.

Detention Storage

The detention storage requirements for the site were determined based on the total property area, the anticipated property uses, and the release rate criteria. Two scenarios were analyzed for both pre- and post-acquisition property conditions, with one scenario assuming

that the wetlands would not be COE jurisdictional, and the second scenario assuming that the wetlands would fall under COE jurisdiction. Therefore, a total of four scenarios were analyzed. For all four scenarios, the development area includes the existing restaurant building, which was assumed to be eliminated as part of the development. The whole site was assumed to be a commercial land use excluding the detention area and the assumed right of way for the extension of 163rd Street. TR-20 models were developed to determine the volume required to meet the Village's release rate criteria for the 2- and 100-year storm events.

Table 1 below summarizes the required storage volumes for each of the four scenarios. Exhibits 1 through 4 depict the proposed stormwater detention basin layouts for each case. Scenario #1 reflects pre-acquisition conditions and non-jurisdictional wetlands. Scenario #2 reflects pre-acquisition conditions and COE jurisdictional wetlands. Scenario #3 reflects post-acquisition conditions and non-jurisdictional wetlands. Scenario #4 reflects post-acquisition conditions and COE jurisdictional wetlands.

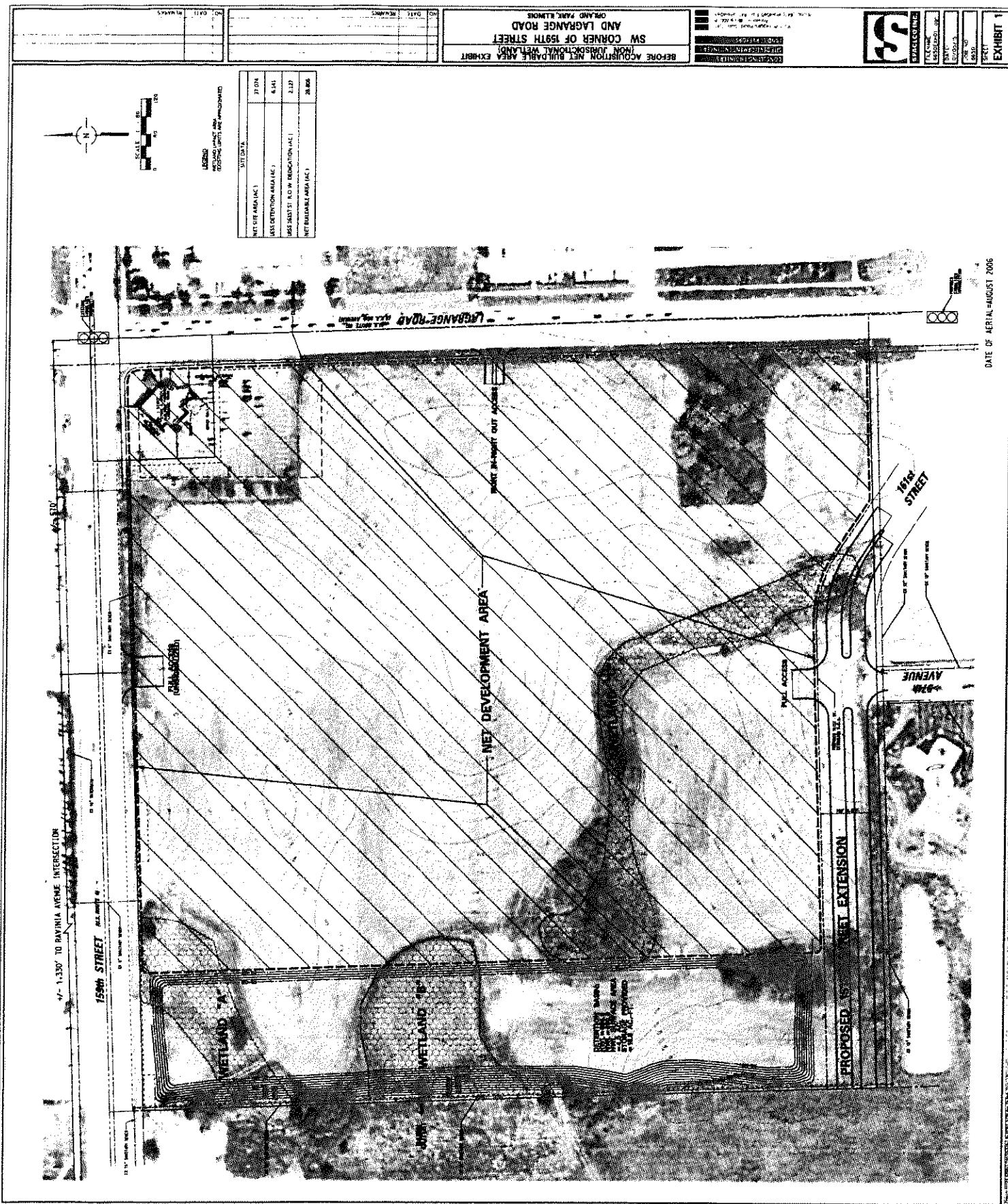
Table 1.
Required Stormwater Detention Storage Volumes

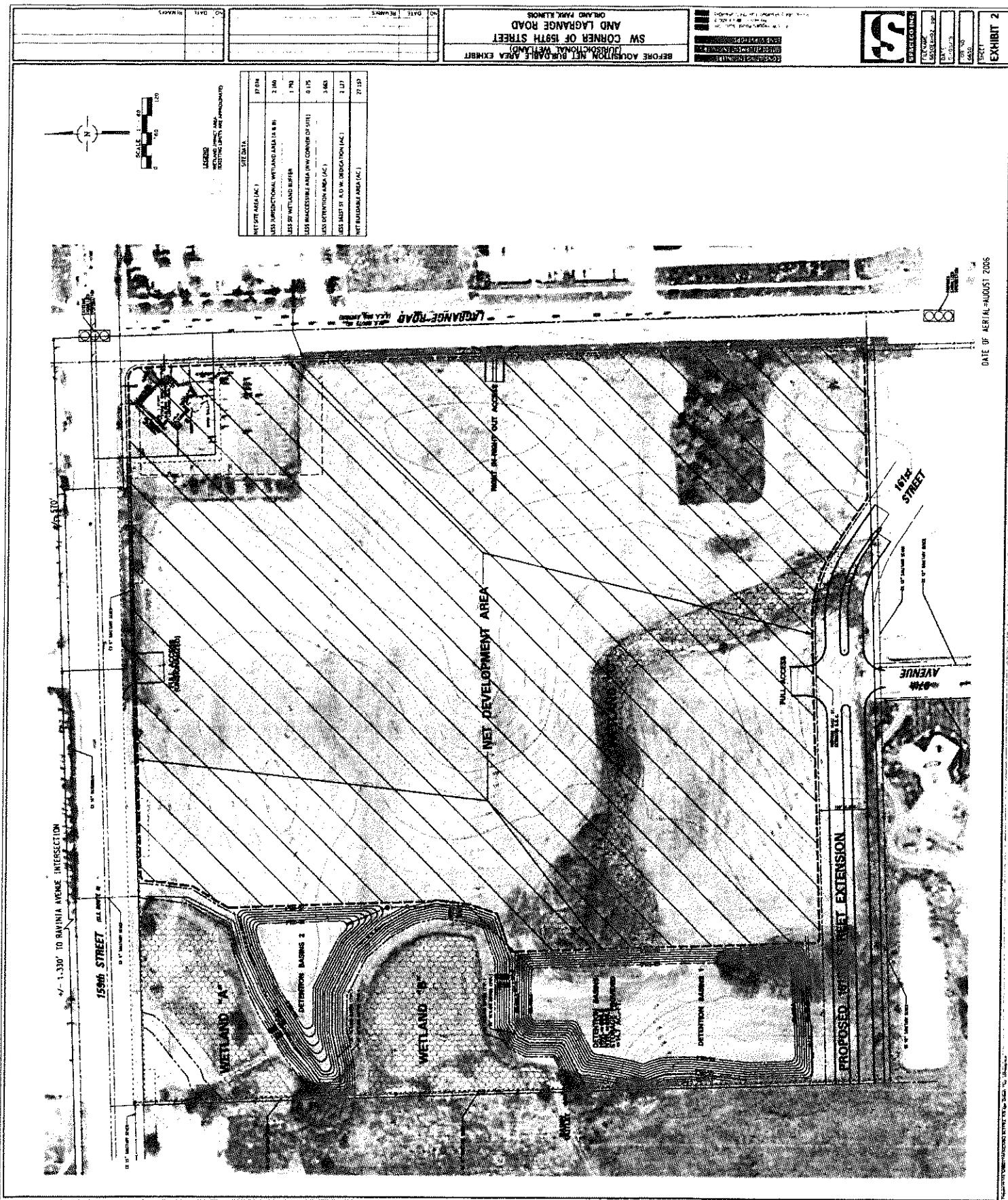
	Development Scenario			
	#1	#2	#3	#4
Pre- or Post-Acquisition	Pre	Pre	Post	Post
Assumed Wetland Jurisdiction	None	COE	None	COE
Development area (ac)	37.1	33.0	35.1	31.2
Required Depressional Storage Volume (ac-ft)	0.5	0.0	0.5	0.0
Required Detention Volume (ac-ft)	16.5	14.5	15.5	13.7
Total Required Detention Storage (ac-ft)	17.0	14.5	16.0	13.7

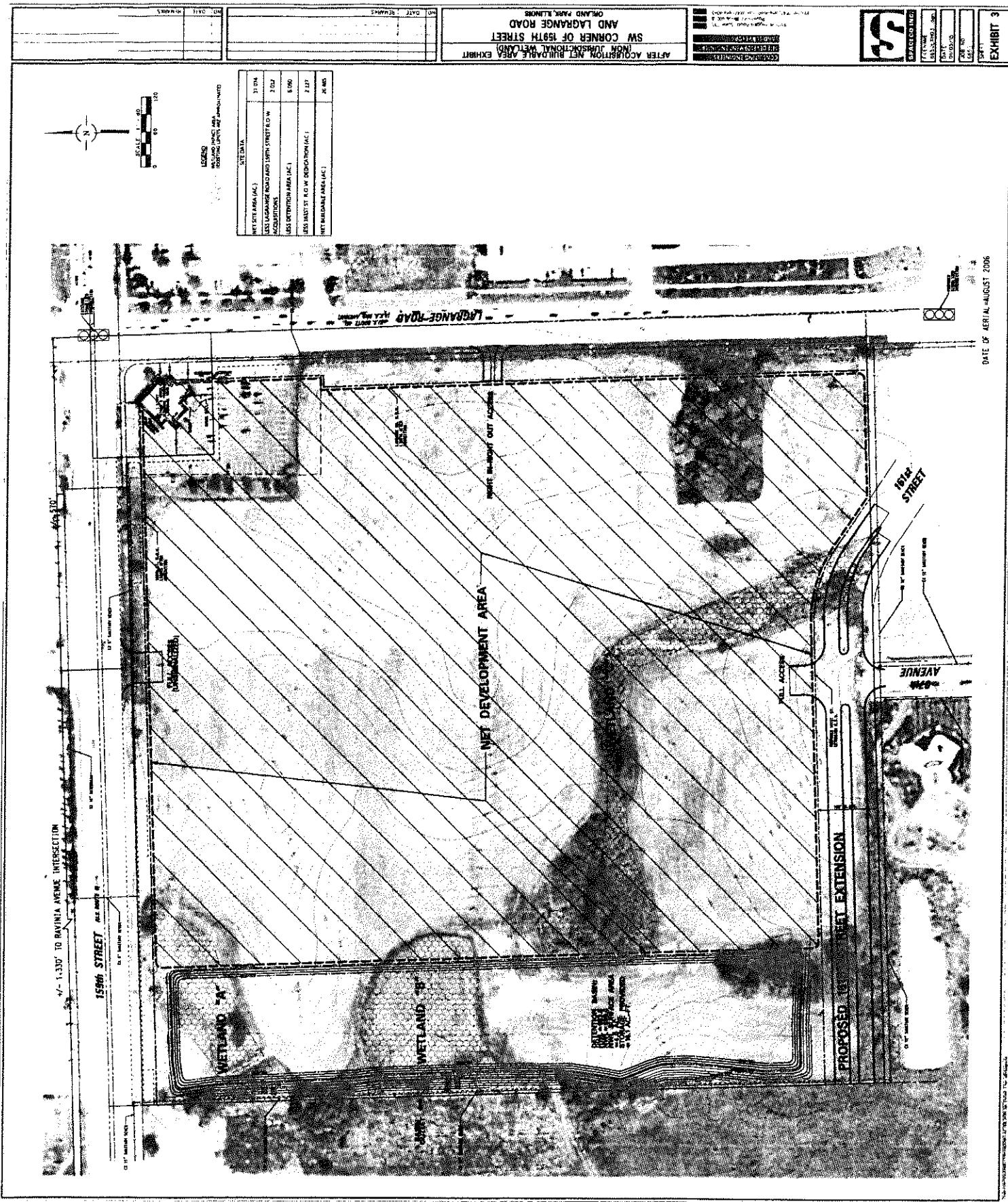
As shown on the concept development plans, the required storage volume would be provided in a basin or basins on the west property line. The normal water level of the proposed basin in each scenario was set so that the basin can discharge at grade at the property line. For scenarios #1 and #3, the basin as shown will modify existing wetland areas A and B. Also, it was assumed that Wetland C could be filled as part of the development. It was assumed that the wetland impacts would be allowed by the Village if the stormwater management facility was designed as a wetland basin. As a wetland basin, the maximum bounce between the normal and high water levels of the basin was set at 4'.

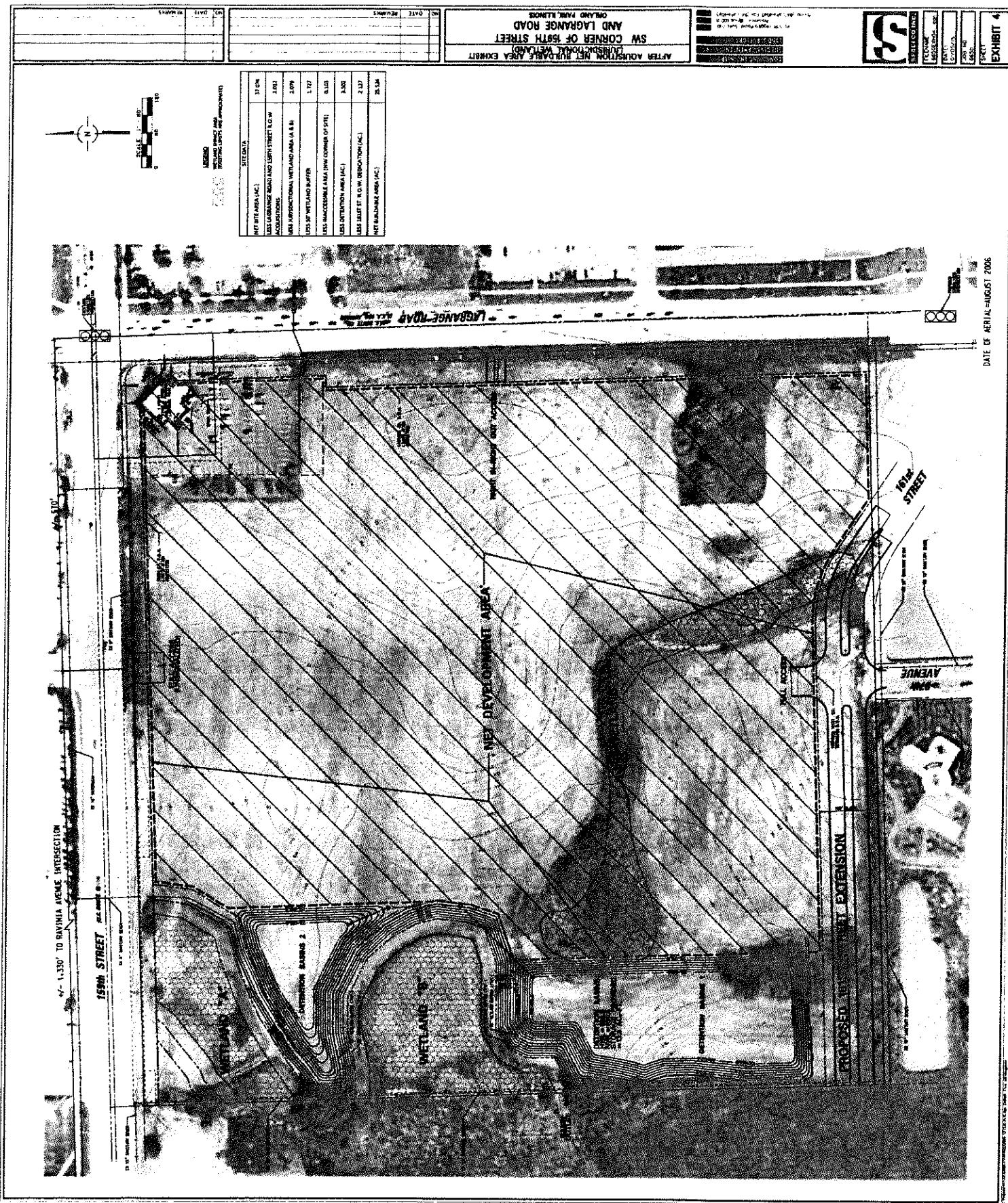
- For scenarios (#1 and #3), the detention basins were designed so that the bottom area was large enough to provide the required wetland mitigation (4.0 acres).
- Scenarios #2 and #4 assumed that the wetlands could not be filled, so the basins were designed to avoid the wetlands and buffer areas. The basins would not need to be designed as wetlands, therefore the bounce was increased to 6', and the footprint was minimized to provide the required storage volume and not based on required wetland mitigation.

Attachment A











*Scanned
April 2015*

Illinois Department of Transportation

Division of Highways/District 1
201 West Center Court/Schaumburg, Illinois 60196-1096

BUREAU OF LAND ACQUISITION

Route: US 6
Location: US 45 to 94th Avenue
County: Cook
Job No.: R-90-003-05
Parcel: 0FZ0035

March 18, 2015

Ms. Barb O'Brien
Village of Orland Park
14700 S. Ravinia Avenue
Orland Park, Illinois 60462

Dear Ms. O'Brien:

Enclosed please find invoice number 96324 dated March 13, 2015 in the amount of \$680.00 from Walker, Wilcox Matousek LLP for services rendered in February, 2015. The invoice covers the expense of eminent domain proceedings for the above-referenced parcel. This statement is being forwarded to the Village of Orland Park for payment.

Please submit your remittance directly to Walker, Wilcox Matousek LLP, to the attention of attorney Amanda Ripp. *Also, please send a copy of your remittance to Ms. Sheila Derka (IDOT).*

Should you have any questions or require additional information, please do not hesitate to contact Ms. Sheila Derka, Local Agency Acquisition Coordinator, at (847) 705-4291.

Very truly yours,

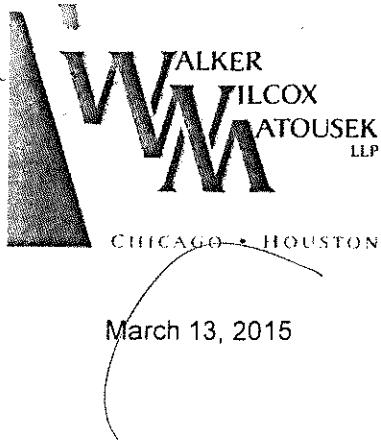
John Fortmann, P.E.
Deputy Director of Highways
Region One Engineer

A handwritten signature in black ink that reads "Jose Rios". To the right of the signature is a small, circular, handwritten mark that appears to be a stylized '2' or a similar symbol.

By:
Jose Rios
Acting Bureau Chief of Land Acquisition

Enclosure

cc: Ms. Sheila Derka (w/o encl.)
Amanda Ripp, Esq. (w/o encl.)



One North Franklin Street
Suite 3200
Chicago, IL 60606-3610
Phone 312.244.6700
Fax 312.244.6800
www.wwmlawyers.com

Federal Tax ID: 20- 2504747

March 13, 2015

Illinois Department of Transportation
John D. McDonough

INVOICE SUMMARY

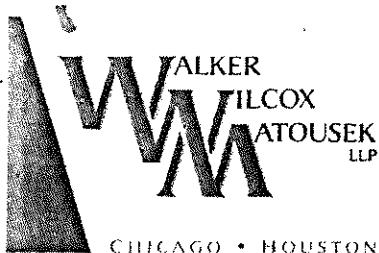
For legal services rendered and costs advanced through February 28, 2015.

Invoice #: 96324
WWM File #: 901982.11

Re: US Rte. 6 IDOT v. GreatBanc Trust Co. Tr
Parcel # 0FZ0034 A&B and TE-A&B
Parcel #0FZ0035
Job # R90-003-05
Cook County
Case # 06 L 050813

PREVIOUS BALANCE OUTSTANDING	\$ 803.50
Total Current Legal Services	\$ 680.00
Total Current Advances	<u>\$.00</u>
TOTAL CURRENT INVOICE	\$ 680.00

(Handwritten signature over the table)



One North Franklin Street
Suite 3200
Chicago, IL 60606-3610
Phone 312.244.6700
Fax 312.244.6800
www.wwmlawyers.com

Federal Tax ID: 20-2504747

March 13, 2015

Illinois Department of Transportation
John D. McDonough

Invoice #: 96324
Account #: 901982.11

Re: US Rte. 6 IDOT v. GreatBanc Trust Co. Tr
Parcel # 0FZ0034 A&B and TE-A&B
Parcel #0FZ0035
Job # R90-003-05
Cook County
Case # 06 L 050813

LEGAL SERVICES

<u>Date</u>	<u>Atty</u>	<u>Description of Services Rendered</u>	<u>Hours</u>	<u>Amount</u>
2/19/15	CLC	Update spreadsheet of experts' invoices; prepare letter to Mr. Rios with experts' invoice.	.50	50.00
2/23/15	AR	Correspondence with land planner re status of report; receipt and review of report; correspondence with architect re opinions to reconfigure the property post taking; correspondence with opposing counsel re status hearing.	.70	140.00
2/24/15	AR	Prepare non-appraisal expert reports for production for court status.	.40	80.00
2/24/15	CLC	Prepare electronic files for Department's numerous expert reports; Bates-label Department's expert reports.	1.00	100.00
2/25/15	AR	Telephone conference with opposing counsel re status hearing and request to extend discovery to exchange non-appraisal reports; appear for and attend court status; enter order.	.80	160.00
2/27/15	AR	Correspondence with appraiser re production of non-appraisal reports to consider in developing opinions of value; forward to appraiser third party documents to consider for report.	.30	60.00
2/27/15	CLC	Prepare CD of comparable sales documents related to the property; prepare letter to expert with CD.	.90	90.00
TOTALS			4.60	\$680.00

March 13, 2015
Invoice #: 96324

TOTAL LEGAL SERVICES **\$ 680.00**

FEE SUMMARY

Name	Staff Level	Hours	Rate	Total
Amanda Ripp	Of Counsel	2.20	200.00	440.00
Catherine L. Cifonelli	Paralegal	2.40	100.00	240.00
TOTALS		4.60		\$680.00

TOTAL CURRENT INVOICE **\$ 680.00**

INVOICES OUTSTANDING

Invoice Number	Date	Invoice Total	Payments Received	Ending Balance
95722	2/12/15	803.50	.00	803.50

PREVIOUS BALANCE OUTSTANDING **\$ 803.50**

TOTAL BALANCE DUE **\$ 1,483.50**



One North Franklin Street
Suite 3200
Chicago, IL 60606-3610
Phone 312.244.6700
Fax 312.244.6800
www.wwmlawyers.com

Federal Tax ID: 20-2504747

March 13, 2015

Illinois Department of Transportation
John D. McDonough

REMITTANCE ADVICE

For legal services rendered and costs advanced through February 28, 2015.

Invoice #: 96324
WWM File #: 901982.11

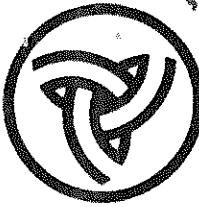
Re: US Rte. 6 IDOT v. GreatBanc Trust Co. Tr
Parcel # 0FZ0034 A&B and TE-A&B
Parcel #0FZ0035
Job # R90-003-05
Cook County
Case # 06 L 050813

PREVIOUS BALANCE OUTSTANDING	\$ 803.50
Total Current Legal Services	\$ 680.00
Total Current Advances	<u>\$.00</u>
TOTAL CURRENT INVOICE	\$ 680.00
TOTAL BALANCE DUE	<u>\$ 1,483.50</u>

To insure proper credit to your account, please return this page with your payment.

TERMS: NET 30 DAYS

For wire transfer information, please contact Accounting:
accounting@wwmlawyers.com or 312.244.6700



Mem
2/15 Second

Illinois Department of Transportation

Division of Highways/District 1
201 West Center Court/Schaumburg, Illinois 60196-1096

BUREAU OF LAND ACQUISITION

Route: US 6
Location: US 45 to 94th Avenue
County: Cook
Job No.: R-90-003-05
Parcel: OFZ0035

February 18, 2015

Ms. Barb O'Brien
Village of Orland Park
14700 S. Ravinia Avenue
Orland Park, Illinois 60462

Dear Ms. O'Brien:

Enclosed please find invoice number 95722 dated February 12, 2015 in the amount of \$803.50 from Walker, Wilcox Matousek LLP for services rendered in January, 2015. The invoice covers the expense of eminent domain proceedings for the above-referenced parcel. This statement is being forwarded to the Village of Orland Park for payment.

Please submit your remittance directly to Walker, Wilcox Matousek LLP, attention Ms. Antonia S. Pritchard. *Also, please send a copy of your remittance to Ms. Sheila Derka (IDOT).*

Should you have any questions or require additional information, please do not hesitate to contact Ms. Sheila Derka, Local Agency Acquisition Coordinator, at (847) 705-4291.

Very truly yours,

John Fortmann, P.E.
Deputy Director of Highways
Region One Engineer

By:
Jose Rios
Acting Bureau Chief of Land Acquisition

Enclosure

cc: Ms. Sheila Derka (w/o encl.)
Ms. Antonia S. Pritchard (w/o encl.)



One North Franklin Street
Suite 3200
Chicago, IL 60606-3610
Phone 312.244.6700
Fax 312.244.6800
www.wwmlawyers.com

Federal Tax ID: 20-2504747

February 12, 2015

Illinois Department of Transportation
John D. McDonough

INVOICE SUMMARY

For legal services rendered and costs advanced through January 31, 2015.

Invoice #: 95722
WWM File #: 901982.11

Re: US Rte. 6 IDOT v. GreatBanc Trust Co. Tr
Parcel # 0FZ0034 A&B and TE-A&B
Parcel #0FZ0035
Job # R90-003-05
Cook County
Case # 06 L 050813

PREVIOUS BALANCE OUTSTANDING	\$ 195.50
Total Current Legal Services	\$ 803.50
Total Current Advances	<u>\$.00</u>
TOTAL CURRENT INVOICE	\$ 803.50



One North Franklin Street
Suite 3200
Chicago, IL 60606-3610
Phone 312.244.6700
Fax 312.244.6800
www.wwmlawyers.com

Federal Tax ID: 20-2504747

February 12, 2015

Illinois Department of Transportation
John D. McDonough

Invoice #: 95722
Account #: 901982.11

Re: US Rte. 6 IDOT v. GreatBanc Trust Co. Tr
Parcel # 0FZ0034 A&B and TE-A&B
Parcel #0FZ0035
Job # R90-003-05
Cook County
Case # 06 L 050813

LEGAL SERVICES

<u>Date</u>	<u>Atty</u>	<u>Description of Services Rendered</u>	<u>Hours</u>	<u>Amount</u>
1/05/15	AR	Telephone conference with land planner re finalizing report but to add information of redevelopment properties with improvements; telephone conference with wetland study engineer to finalize report.	.40	80.00
1/13/15	AR	Correspondence with opposing counsel re status hearing; conference with Casey re handling status due to conflict on other case.	.30	60.00
1/13/15	MWC	Prepare engagement letter to Frank Lorenz.	.20	33.00
1/14/15	MWC	Prepare order setting status date; attend court, present order.	1.70	280.50
1/14/15	CLC	Review and update pleadings; docketing; prepare letter to opposing counsel with order.	1.30	130.00
1/29/15	AR	Prepare for and attend case status; correspondence with experts re status of their reports.	1.10	220.00
		TOTALS	5.00	\$803.50
		TOTAL LEGAL SERVICES		\$ 803.50

February 12, 2015
Invoice #: 95722

FEE SUMMARY

<u>Name</u>	<u>Staff Level</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Amanda Ripp	Of Counsel	1.80	200.00	360.00
Matthew W. Casey	Associate	1.90	165.00	313.50
Catherine L. Cifonelli	Paralegal	1.30	100.00	130.00
TOTALS		5.00		\$803.50

TOTAL CURRENT INVOICE \$ 803.50

INVOICES OUTSTANDING

<u>Invoice Number</u>	<u>Date</u>	<u>Invoice Total</u>	<u>Payments Received</u>	<u>Ending Balance</u>
95590	1/14/15	195.50	.00	195.50

PREVIOUS BALANCE OUTSTANDING \$ 195.50

TOTAL BALANCE DUE \$ 999.00



One North Franklin Street
Suite 3200
Chicago, IL 60606-3610
Phone 312.244.6700
Fax 312.244.6800
www.wwmlawyers.com

Federal Tax ID: 20- 2504747

February 12, 2015

Illinois Department of Transportation
John D. McDonough

REMITTANCE ADVICE

For legal services rendered and costs advanced through January 31, 2015.

Invoice #: 95722
WWM File #: 901982.11

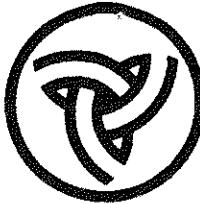
Re: US Rte. 6 IDOT v. GreatBanc Trust Co. Tr
Parcel # 0FZ0034 A&B and TE-A&B
Parcel #0FZ0035
Job # R90-003-05
Cook County
Case # 06 L 050813

PREVIOUS BALANCE OUTSTANDING	\$ 195.50
Total Current Legal Services	\$ 803.50
Total Current Advances	\$.00
TOTAL CURRENT INVOICE	\$ 803.50
TOTAL BALANCE DUE	<u>\$ 999.00</u>

To insure proper credit to your account, please return this page with your payment.

TERMS: NET 30 DAYS

For wire transfer information, please contact Accounting:
accounting@wwmlawyers.com or 312.244.6700



Illinois Department of Transportation

Division of Highways/District 1
201 West Center Court/Schaumburg, Illinois 60196-1096

BUREAU OF LAND ACQUISITION

Route: US 6

Location: US 45 to 94th Avenue

County: Cook

Job No.: R-90-003-05

Parcels: 0FZ0034 and 0FZ0035

2014

January 23, 2015 (revising letter of December 12, 2014)

Village of Orland Park
14700 S. Ravinia Avenue
Orland Park, Illinois 60462
Attn: Ms. Barb O'Brien



Dear Ms. O'Brien:

Enclosed please find an invoice from Kerr & Associates, Inc. dated November 4, 2014 in the amount of \$5,200.00. This invoice was submitted by Amanda Ripp, Special Assistant Attorney-General and is now being forwarded to the Village of Orland Park for payment. The invoice covers the expense of eminent domain proceedings for the above-referenced parcels.

Please submit your remittance directly to Kerr & Associates, Inc., with a copy to attorney Amanda Ripp of Walker, Wilcox Matousek LLP. *Also, please send a copy of your remittance to Ms. Sheila Derka (IDOT).*

Should you have any questions or require additional information, please do not hesitate to contact Ms. Sheila Derka, Local Agency Acquisition Coordinator, at (847) 705-4291.

Very truly yours,

John Fortmann, P.E.
Deputy Director of Highways
Region One Engineer

A handwritten signature in black ink that reads "Jose Rios".

By:
Jose Rios
Acting Bureau Chief of Land Acquisition

Enclosure

cc: Ms. Sheila Derka (w/o encl.)
Ms. Amanda Ripp (w/o encl.)

Kerr & Associates, Inc
9516 Ridgeway
Evanston, IL 60203
Ph 847-774-9529

November 4, 2014

Amanda Ripp
Walker Wilcox Matousek LLP
One North Franklin, Suite 3200
Chicago, IL 60606
Ford Britton, P.C.

Re: Kerr & Associates
Invoice for Petey's II
US 6 and US 45 – Southwest Corner
Parcels 0FZ0035, 0FZ0034 A&B and TE-A&B

Job No. R-90-003-05

Dear Ms. Ripp:

Fees for services rendered on professional witnessing projects.

<u>CODE REVIEW, PERMIT RESEARCH, FIELD CONDITION VERIFICATION,</u>		
<u>MEETINGS:</u>	12 HRS X\$200.00/HR	=\$2,400.00
<u>DOCUMENT / REPORT PREPARATION:</u>	14 HRS X\$200.00/HR	=\$2,800.00
<u>TOTAL:</u>		=\$5,200.00

Please call if you have any questions.

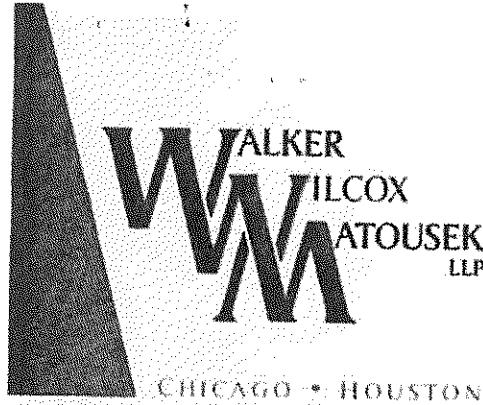
Sincerely,



Trista L. Kerr, President
Kerr & Associates, Inc.

Approved Amanda Ripp
Special Asst Atty General

K E R R & A S S O C I A T E S, I N C.
9516 RIDGEWAY
EVANSTON, IL 60203
847-674-2004 PH 847-631-0798 FAX



CHICAGO • HOUSTON

RECEIVED

DEC 08 2014

LAND ACQUISITION

FOUNDEES

William E. Billa
Robert R. Conlon
Edward P. Gibbons
Celeste M. King
Gary L. Lockwood
Paul E. Matousek
David E. Walker
Mark D. Wilcox

December 2, 2014

Amanda Ripp
Tel: 312-244-6782
Fax: 312.244.6800
ARipp@wwmlawyers.com

John McDonough
District One Bureau Chief
BUREAU OF LAND ACQUISITION
Illinois Department of Transportation
Division of Highways/District 1
201 West Center Court
Schaumburg, Illinois 60196-1096

Re: *IDOT v GreatBanc Trust Co., as Trustee, et al.*

Case No.: 06 L 50813
Route: US Route 6/US Route 45 (Orland Park, IL)
County: Cook
Job No.: R90-003-05
Parcels: OFZ0034 A&B TE-A&B and OFZ0035
Petey's Restaurant
WWM File No.: 901982.011

Dear Mr. McDonough:

Enclosed is an invoice dated November 4, 2014 in the amount of \$5,200.00 from Kerr & Associates, Inc. This invoice is for professional services rendered in connection with the acquisition of the above-referenced parcel. I've also enclosed the report reference in the invoice.

I have approved this invoice for payment. Please call with any questions or concerns regarding the enclosed.

Very truly yours,

WALKER WILCOX MATOUSEK LLP


Amanda Ripp



Illinois Department of Transportation

Division of Highways/District 1
201 West Center Court/Schaumburg, Illinois 60196-1096

BUREAU OF LAND ACQUISITION

Route: US 6
Location: US 45 to 94th Avenue
County: Cook
Job No.: R-90-003-05
Parcel: 0FZ0035

January 16, 2015

Ms. Barb O'Brien
Village of Orland Park
14700 S. Ravinia Avenue
Orland Park, Illinois 60462



Dear Ms. O'Brien:

Enclosed, please find invoice number 94594 dated January 14, 2015 in the amount of \$195.50 from Walker, Wilcox Matousek LLP for services rendered in December, 2014. The invoice covers the expense of eminent domain proceedings for the above-referenced parcel. This statement is being forwarded to the Village of Orland Park for payment.

Please submit your remittance directly to Walker, Wilcox Matousek LLP, attention Ms. Antonia S. Pritchard. *Also, please send a copy of your remittance to Ms. Sheila Derka (IDOT).*

Should you have any questions or require additional information, please do not hesitate to contact Ms. Sheila Derka, Local Agency Acquisition Coordinator, at (847) 705-4291.

Very truly yours,

John Fortmann, P.E.
Deputy Director of Highways
Region One Engineer

By:

Jose Rios

Acting Bureau Chief of Land Acquisition

Enclosure

cc: Ms. Sheila Derka (w/o encl.)
Ms. Antonia S. Pritchard (w/o encl.)



One North Franklin Street
Suite 3200
Chicago, IL 60606-3610
Phone 312.244.6700
Fax 312.244.6800
www.wwmlawyers.com

Federal Tax ID: 20- 2504747

January 14, 2015

Illinois Department of Transportation
John D. McDonough

INVOICE SUMMARY

For legal services rendered and costs advanced through December 31, 2014.

Invoice #: 94594
WWM File #: 901982.11

Re: US Rte. 6 IDOT v. GreatBanc Trust Co. Tr
Parcel # 0FZ0034 A&B and TE-A&B
Parcel #0FZ0035
Job # R90-003-05
Cook County
Case # 06 L 050813

PREVIOUS BALANCE OUTSTANDING	\$ 5,260.50
Total Current Legal Services	\$ 195.50
Total Current Advances	<u>\$.00</u>
TOTAL CURRENT INVOICE	\$ 195.50



One North Franklin Street
Suite 3200
Chicago, IL 60606-3610
Phone 312.244.6700
Fax 312.244.6800
www.wwmlawyers.com

Federal Tax ID: 20-2504747

January 14, 2015

Illinois Department of Transportation
John D. McDonough

Invoice #: 94594
Account #: 901982.11

Re: US Rte. 6 IDOT v. GreatBanc Trust Co. Tr
Parcel # 0FZ0034 A&B and TE-A&B
Parcel #0FZ0035
Job # R90-003-05
Cook County
Case # 06 L 050813

LEGAL SERVICES

<u>Date</u>	<u>Atty</u>	<u>Description of Services Rendered</u>	<u>Hours</u>	<u>Amount</u>
12/02/14	CLC	Update spreadsheet of experts' invoices; prepare letter to Mr. McDonough with expert's invoice.	.50	50.00
12/22/14	MWC	Attend court; present agreed order setting date for status.	.70	115.50
12/22/14	CLC	Prepare letter to opposing counsel with order.	.30	30.00
TOTALS			1.50	\$195.50
TOTAL LEGAL SERVICES				\$ 195.50

FEE SUMMARY

<u>Name</u>	<u>Staff Level</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Matthew W. Casey	Associate	.70	165.00	115.50
Catherine L. Cifonelli	Paralegal	.80	100.00	80.00
TOTALS		1.50		\$195.50

TOTAL CURRENT INVOICE **\$ 195.50**

January 14, 2015
Invoice #: 94594

INVOICES OUTSTANDING

<u>Invoice Number</u>	<u>Date</u>	<u>Invoice Total</u>	<u>Payments Received</u>	<u>Ending Balance</u>
92563	11/10/14	3,930.00	.00	3,930.00
93642	12/10/14	1,330.50	.00	1,330.50

PREVIOUS BALANCE OUTSTANDING \$ 5,260.50

TOTAL BALANCE DUE \$ 5,456.00



One North Franklin Street
Suite 3200
Chicago, IL 60606-3610
Phone 312.244.6700
Fax 312.244.6800
www.wwmlawyers.com

Federal Tax ID: 20-2504747

January 14, 2015

Illinois Department of Transportation
John D. McDonough

REMITTANCE ADVICE

For legal services rendered and costs advanced through December 31, 2014.

Invoice #: 94594
WWM File #: 901982.11

Re: US Rte. 6 IDOT v. GreatBanc Trust Co. Tr
Parcel # 0FZ0034 A&B and TE-A&B
Parcel #0FZ0035
Job # R90-003-05
Cook County
Case # 06 L 050813

PREVIOUS BALANCE OUTSTANDING	\$ 5,260.50
Total Current Legal Services	\$ 195.50
Total Current Advances	<u>\$.00</u>
TOTAL CURRENT INVOICE	\$ 195.50
TOTAL BALANCE DUE	<u>\$ 5,456.00</u>

To insure proper credit to your account, please return this page with your payment.

TERMS: NET 30 DAYS

For wire transfer information, please contact Accounting:
accounting@wwmlawyers.com or 312.244.6700



Illinois Department of Transportation

Division of Highways/District 1
201 West Center Court/Schaumburg, Illinois 60196-1096

BUREAU OF LAND ACQUISITION

Route: US 6
Location: US 45 to 94th Avenue
County: Cook
Job No.: R-90-003-05
Parcel: 0FZ0035

November 17, 2014

Ms. Barb O'Brien
Village of Orland Park
14700 S. Ravinia Avenue
Orland Park, Illinois 60462

Dear Ms. O'Brien:

Enclosed please find invoice number 92563 dated November 10, 2014 in the amount of \$3,930.00 from Walker, Wilcox-Matousek LLP for services rendered in October, 2014. The invoice covers the expense of eminent domain proceedings for the above-referenced parcel. This statement is being forwarded to the Village of Orland Park for payment.

Please submit your remittance directly to Walker, Wilcox Matousek LLP, attention Ms. Antonia S. Pritchard. *Also, please send a copy of your remittance to Ms. Sheila Derka (IDOT).*

Should you have any questions or require additional information, please do not hesitate to contact Ms. Sheila Derka, Local Agency Acquisition Coordinator, at (847) 705-4291.

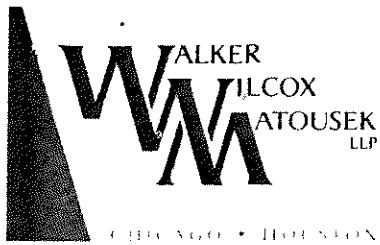
Very truly yours,

John Fortmann, P.E.
Deputy Director of Highways
Region One Engineer

By: 
John McDonough
Bureau Chief of Land Acquisition

Enclosure

cc: Ms. Sheila Derka (w/o encl.)
Ms. Antonia S. Pritchard (w/o encl.)



One North Franklin Street
Suite 3200
Chicago, IL 60606-3610
Phone 312.244.6700
Fax 312.244.6800
www.wwmlawyers.com

Federal Tax ID: 20-2504747

November 10, 2014

Illinois Department of Transportation
John D. McDonough

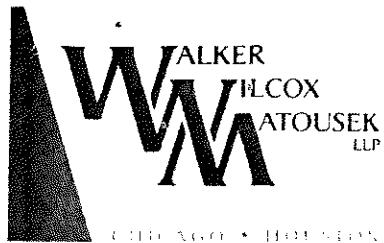
INVOICE SUMMARY

For legal services rendered and costs advanced through October 31, 2014.

Invoice #: 92563
WWM File #: 901982.11

Re: US Rte. 6 IDOT v. GreatBanc Trust Co. Tr
Parcel # 0FZ0034 A&B and TE-A&B
Parcel #0FZ0035
Job # R90-003-05
Cook County
Case # 06 L 050813

PREVIOUS BALANCE OUTSTANDING	\$ 1,580.00
Total Current Legal Services	\$ 3,930.00
Total Current Advances	<u>\$.00</u>
TOTAL CURRENT INVOICE	\$ 3,930.00



CHICAGO • BIRMINGHAM

One North Franklin Street
Suite 3200
Chicago, IL 60606-3610
Phone 312.244.6700
Fax 312.244.6800
www.wwmlawyers.com

Federal Tax ID: 20- 2504747

November 10, 2014

Illinois Department of Transportation
John D. McDonough

Invoice #: 92563
Account #: 901982.11

Re: US Rte. 6 IDOT v. GreatBanc Trust Co. Tr
Parcel # 0FZ0034 A&B and TE-A&B
Parcel #0FZ0035
Job # R90-003-05
Cook County
Case # 06 L 050813

LEGAL SERVICES

<u>Date</u>	<u>Atty</u>	<u>Description of Services Rendered</u>	<u>Hours</u>	<u>Amount</u>
10/01/14	AR	Review and analysis of land plan and assumption to tear down; analyze whether to prepare plan with building there and if that impacts plan.	1.20	240.00
10/02/14	ASP	Work on analysis with A. Ripp re: obtaining a new valuation date, attorneys fees, highest and best use before and after.	1.20	240.00
10/02/14	AR	Review and analyze changing date of value in case and argument for why change necessary; telephone conference with appraiser re valuation question; telephone conference with land planner re issues with changing date of value; review of motions and court ruling on amendment to complaint to make argument for new date of value; telephone conference with opposing counsel re rescheduling meeting.	2.10	420.00
10/03/14	AR	Continued review of file; draft motion to confirm date of value is date of amendment based upon court ruling of abandonment. Telephone conference with IDOT appraiser re information re golf course sale which is similar to subject property.	5.30	1,060.00
10/06/14	AR	Continued drafting of motion to confirm date of value; prepare for and conduct meeting with opposing counsel; review and analysis of market in 2008; telephone conference with consulting expert re when in 2008 did market crash.	3.20	640.00

November 10, 2014

Invoice #: 92563

<u>Date</u>	<u>Atty</u>	<u>Description of Services Rendered</u>	<u>Hours</u>	<u>Amount</u>
10/07/14	AR	Review and analysis of market in 2006 vs 2008 to determine change in valuation date; telephone conference with IDOT appraiser re market valuation study between time periods; receipt and review of potential comparable sales.	3.20	640.00
10/08/14	AR	Telephone conference with consulting expert appraiser re market study between 2006 and 2008 to determine date of value issues.	.50	100.00
10/10/14	AR	Telephone conference with developer in area re familiarity with property, valuation issues and condition of property; telephone conference with IDOT engineer re costs to obtain soil borings to determine viability of soil for development; telephone conference with IDOT re authority to expend funds if reasonable.	.80	160.00
10/10/14	CLC	Update spreadsheet of experts' invoices; prepare letter to Mr. McDonough with expert's invoice.	.50	50.00
10/13/14	AR	Draft motion to inspection the real estate including soil boring testing.	.50	100.00
10/15/14	AR	Extended telephone conference with consulting appraisal expert re issues regarding change date of value to April, 2008 and if better than 2006, request additional research on sales and listings.	.70	140.00
10/16/14	AR	Telephone conference with IDOT re consulting appraiser's preliminary opinion regarding changing date of value and request to conduct soil boring investigation on condition of land.	.30	60.00
10/17/14	CLC	Prepare notice of motion for motion to inspect property.	.40	40.00
10/22/14	CLC	Prepare letter to Judge with courtesy copy of motion.	.40	40.00
TOTALS			20.30	\$3,930.00
TOTAL LEGAL SERVICES				\$ 3,930.00

FEES SUMMARY

Name	Staff Level	Hours	Rate	Total
Antonia S. Pritchard	Of Counsel	1.20	200.00	240.00
Amanda Ripp	Of Counsel	17.80	200.00	3,560.00
Catherine L. Cifonelli	Paralegal	1.30	100.00	130.00
TOTALS		20.30		\$3,930.00

TOTAL CURRENT INVOICE \$ 3,930.00

November 10, 2014
Invoice #: 92563

INVOICES OUTSTANDING

<u>Invoice Number</u>	<u>Date</u>	<u>Invoice Total</u>	<u>Payments Received</u>	<u>Ending Balance</u>
91670	10/08/14	1,580.00	.00	1,580.00

PREVIOUS BALANCE OUTSTANDING \$ 1,580.00

TOTAL BALANCE DUE \$ 5,510.00



One North Franklin Street
Suite 3200
Chicago, IL 60606-3610
Phone 312.244.6700
Fax 312.244.6800
www.wwmlawyers.com

Federal Tax ID: 20- 2504747

November 10, 2014

Illinois Department of Transportation
John D. McDonough

REMITTANCE ADVICE

For legal services rendered and costs advanced through October 31, 2014.

Invoice #: 92563
WWM File #: 901982.11

Re: US Rte. 6 IDOT v. GreatBanc Trust Co. Tr
Parcel # 0FZ0034 A&B and TE-A&B
Parcel #0FZ0035
Job # R90-003-05
Cook County
Case # 06 L 050813

PREVIOUS BALANCE OUTSTANDING	\$ 1,580.00
Total Current Legal Services	\$ 3,930.00
Total Current Advances	<u>\$.00</u>
TOTAL CURRENT INVOICE	\$ 3,930.00
TOTAL BALANCE DUE	<u>\$ 5,510.00</u>

To insure proper credit to your account, please return this page with your payment.

TERMS: NET 30 DAYS

For wire transfer information, please contact Accounting:
accounting@wwmlawyers.com or 312.244.6700