

CICERO, FRANCE & ALEXANDER, P.C.

ATTORNEYS AT LAW

6323 EAST RIVERSIDE BOULEVARD

ROCKFORD, ILLINOIS 61114

**PAUL R. CICERO
CHARLES P. ALEXANDER
CHANTEL R. BIELSKIS
ANDREW T. SMITH
ERIK K. JACOBS
KIMBERLY A. KOVANDA**

**TEL: (815) 226-7700
FAX: (815) 226-7701**

**JOHN W. FRANCE
RETIRED**

February 19, 2020

Edward X. Clinton
Julia C. Williams
The Clinton Law Firm, LLC
111 W. Washington Street
Suite 1437

**Re: Response to Records Subpoena
Your Client – Paul Dulberg
Your Case No - 17 LA 377**

Dear Mr. Clinton and Ms. Williams:

In follow-up to our prior communications regarding the above-referenced case, please find, enclosed, one DVD containing my firm's response to your records subpoena. Please note that, for the sake of completeness and convenience, the DVD contains all of the documents previously sent via email as well as the remaining documents I am producing.

Regarding the medical records and bills in my possession, due to the volume, I have included a list of the facilities from which we have records/bills and identified the source of the records (for example, Complex Legal Services).

I have included a similar list of the deposition transcripts in my possession along with the relevant court reporters so that you may order same if you wish.

Finally, I do have in my possession a copy of the MT 3500 Operator's Instruction Manual. However, due to the physical nature of the document, producing a copy would require sending it to an outside copying service. If you would like me to do so at your firm's expense, please let me know.

If you have any questions concerning this, do not hesitate to contact me.

Very truly yours,

Cicero, France & Alexander, P.C.

A handwritten signature in black ink, reading "Chantel R. Bielskis". The signature is written in a cursive, flowing style with a large, prominent initial "C".

CHANTEL R. BIELSKIS

Enclosure

rb/closed.files/dulberg/subpoena.response/01ltrClinton.Law.Firm.2.19.20.docx