

From: Chantel Bielskis CB@cicerofrance.com
Subject: RE: Dulberg (AOIC Claim No. 13-2779-11)
Date: December 11, 2019 at 4:48 PM
To: Julia Williams juliawilliams@clintonlaw.net

CB

Hello Julia –

Thank you for your email. I can scan in the pleadings and get those over to you then. It may not be until early next week, however. I can also produce all of the non-privileged correspondence and discovery documents in my file.

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Lastly, I propose sending a list of the deposition transcripts along with the corresponding reporter's info.

Please let me know if this will be adequate in response to your subpoena.

Sincerely,

Chantel R. Bielskis
Attorney at Law
Cicero, France & Alexander, P.C.
6323 E. Riverside Blvd.
Rockford, IL 61114
815.226.7700
815.226.7701 (fax)

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From: Julia Williams [mailto:juliawilliams@clintonlaw.net]
Sent: Wednesday, December 11, 2019 4:37 PM
To: Ed Clinton; Chantel Bielskis
Subject: Re: Dulberg

Hi Chantel,

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I am happy to discuss this with you and get this worked out.

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Of Counsel
The Clinton Law Firm
111 W. Washington, Ste. 1437
Chicago, IL 60602
P:312.357.1515
F: 312.201.0737
juliawilliams@clintonlaw.net

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On Dec 11, 2019, at 4:02 PM, Ed Clinton <ed@clintonlaw.net> wrote:

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From: Ed Clinton [<mailto:ed@clintonlaw.net>]

Sent: Friday, November 22, 2019 4:21 PM

To: Chantel Bielskis

Cc: Julia Williams

Subject: Dulberg

Chantal,

The 14 day extension you requested is fine,


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www.clintonlaw.net
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Correspondenc
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LAW OFFICE T POPOVICH Fax 1-815-344-5280

Jul 15 2013 04:48pm P001/001



The Law Offices of Thomas J. Popovich P.C.

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McHENRY, ILLINOIS 60050
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FACSIMILE: 815.344.5280
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HANS A. MAST
JOHN A. KORNAK

MARK J. VOGG
JAMES P. TUTAJ
ROBERT J. LUMBER
THERESA M. FREEMAN

July 15, 2013

VIA FACSIMILE: 815/226-7701

Ronald A. Barch
Cicero, France, Barch & Alexander, PC
6323 E. Riverside Blvd.
Rockford, IL 61114

**RE: Paul Dulberg vs. David Gagnon, Caroline McGuire and Bill McGuire
McHenry County Case: 12 LA 178**

Dear Mr. Barch:

Thank you for your recent correspondence. You may call the physicians you wish to depose and schedule them with the deposition assistant.

As to the witness, please advise when you are available for his deposition and I will contact my client and try to arrange the deposition through our office.

Thank you for your attention.

I thank you for your cooperation.

Very truly yours,


HANS A. MAST

smq

c: Perry Accardo (fax: 312/558-9357)

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210 NORTH MARTIN LUTHER
KING JR. AVENUE
WAUKEGAN, IL 60085

CICERO, FRANCE, BARCH & ALEXANDER, P.C.

A Professional Corporation

Attorneys at Law

6323 EAST RIVERSIDE BOULEVARD
ROCKFORD, ILLINOIS 61114

PAUL R. CICERO
JOHN W. FRANCE
RONALD A. BARCH
CHARLES P. ALEXANDER
CHANTEL R. BIELSKIS
ANDREW T. SMITH

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

July 30, 2012

Attorney Hans A. Mast
Law Offices of Thomas J. Popovich, PC
3416 West Elm Street
McHenry, IL 60050

Case: *Paul Dulberg v. David Gagnon, Caroline McGuire and Bill McGuire*
(McHenry County Case No. 12 LA 178)

Dear Mr. Mast:

Thanks for calling me back last Friday. As we discussed, I was able to confirm through my clients (Bill and Carolyn McGuire) that the chain saw still exists. They also believe they have the manual and will be searching for same.

We also discussed moving the Motion for Protective Order from Tuesday, July 31, 2012, at 9:00 a.m. to Wednesday, August 1, 2012, at 9:00 a.m. You indicated that somebody from your office would appear on Tuesday and simply set the matter over. Attorney Chantel Bielskis from my office will be there on Wednesday. Thank you for the accommodation.

As to your desire for an inspection and photo shoot of the chain saw and related manual, I have no problem making the arrangements but would prefer to do so only once. Accordingly, it is my understanding that the inspection will be deferred until such time that the co-defendant is of record and ready to proceed as well.

Lastly, upon return to my office this morning I noted that Judge Michael Caldwell has issued a notice recusing himself from the *Dulberg* case. The matter has apparently been re-assigned to Judge Thomas A. Meyer and is currently scheduled for status on August 8, 2012 at 9:00 a.m. If possible, it probably makes sense to move the status date out 60 days when the case is called on Wednesday morning. We can then avoid another trip to court next week.

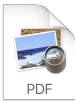
Very truly yours,




RONALD A. BARCH

RB:mj05ltr.HAM

cc Tom Malatia (Claim No. 13-2779-11)



Miss Tolson

From: Julia Williams juliawilliams@clintonlaw.net 
Subject: Re: Dulberg (AOIC Claim No. 13-2779-11)
Date: December 23, 2019 at 3:55 PM
To: Chantel Bielskis CB@cicerofrance.com



Thank you.

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The Clinton Law Firm
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From: Julia Williams juliawilliams@clintonlaw.net 
Subject: Fwd: Dulberg (AOIC Claim No. 13-2779-11)
Date: December 23, 2019 at 3:55 PM
To: George Flynn gflynn@KARBALLAW.COM



Dear George,

Please the below response form Cicero's office re our subpoena.

Best Regards,

Julia Williams
Of Counsel
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The Law Offices of Thomas J. Popovich P.C.

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THOMAS J. POPOVICH

HANS A. MAST

JOHN A. KORNAK

MARK J. VOGG

JAMES P. TUTAJ

ROBERT J. LUMBER

THERESA M. FREEMAN

July 15, 2013

VIA FACSIMILE: 815/226-7701

Ronald A. Barch
Cicero, France, Barch & Alexander, PC
6323 E. Riverside Blvd.
Rockford, IL 61114

RE: *Paul Dulberg vs. David Gagnon, Caroline McGuire and Bill McGuire*
McHenry County Case: 12 LA 178

Dear Mr. Barch:

Thank you for your recent correspondence. You may call the physicians you wish to depose and schedule them with the deposition assistant.

As to the witness, please advise when you are available for his deposition and I will contact my client and try to arrange the deposition through our office.

Thank you for your cooperation.

Very truly yours,



HANS A. MAST

smq

c: Perry Accardo (fax: 312/558-9357)

WAUKEGAN OFFICE
210 NORTH MARTIN LUTHER
KING JR. AVENUE
WAUKEGAN, IL 60085

CICERO, FRANCE, BARCH & ALEXANDER, P.C.

A Professional Corporation

Attorneys at Law

6323 EAST RIVERSIDE BOULEVARD

ROCKFORD, ILLINOIS 61114

PAUL R. CICERO
JOHN W. FRANCE
RONALD A. BARCH
CHARLES P. ALEXANDER

CHANTEL R. BIELSKIS
ANDREW T. SMITH

July 30, 2012

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

Attorney Hans A. Mast
Law Offices of Thomas J. Popovich, PC
3416 West Elm Street
McHenry, IL 60050

Case: *Paul Dulberg v. David Gagnon, Caroline McGuire and Bill McGuire*
(McHenry County Case No. 12 LA 178)

Dear Mr. Mast:

Thanks for calling me back last Friday. As we discussed, I was able to confirm through my clients (Bill and Carolyn McGuire) that the chain saw still exists. They also believe they have the manual and will be searching for same.

We also discussed moving the Motion for Protective Order from Tuesday, July 31, 2012, at 9:00 a.m. to Wednesday, August 1, 2012, at 9:00 a.m. You indicated that somebody from your office would appear on Tuesday and simply set the matter over. Attorney Chantel Bielskis from my office will be there on Wednesday. Thank you for the accommodation.

As to your desire for an inspection and photo shoot of the chain saw and related manual, I have no problem making the arrangements but would prefer to do so only once. Accordingly, it is my understanding that the inspection will be deferred until such time that the co-defendant is of record and ready to proceed as well.

Lastly, upon return to my office this morning I noted that Judge Michael Caldwell has issued a notice recusing himself from the *Dulberg* case. The matter has apparently been re-assigned to Judge Thomas A. Meyer and is currently scheduled for status on August 8, 2012 at 9:00 a.m. If possible, it probably makes sense to move the status date out 60 days when the case is called on Wednesday morning. We can then avoid another trip to court next week.

Very truly yours,



RONALD A. BARCH

RB:mj05ltr.HAM

cc Tom Malatia (Claim No. 13-2779-11)



Misc Telephone
Conf Notes.pdf

From: Chantel Bielskis CB@cicerofrance.com
Subject: RE: Dulberg (AOIC Claim No. 13-2779-11)
Date: December 23, 2019 at 3:59 PM
To: Julia Williams juliawilliams@clintonlaw.net

CB

You are welcome. Attached, please find one of the Exhibits from the Gagnon dep as well as photos of the injury.

Unfortunately, I will not be able to get the remaining documents scanned in and over to you until after the 1st of the year. I apologize for the delay.

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Sent: Monday, December 23, 2019 3:56 PM
To: Chantel Bielskis
Subject: Re: Dulberg (AOIC Claim No. 13-2779-11)

Thank you.

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Of Counsel
The Clinton Law Firm
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Chicago, IL 60602
P: 312.357.1515
F: 312.201.0737
juliawilliams@clintonlaw.net

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Do you have all of your client's medical records and bills? As you can imagine, this makes up a large part of my file and will be quite burdensome to reproduce. As I mentioned to Ed, I propose providing a list of all the treatment facilities from which we received records/bills per subpoena (either ours or Attorney Accardo's) instead.

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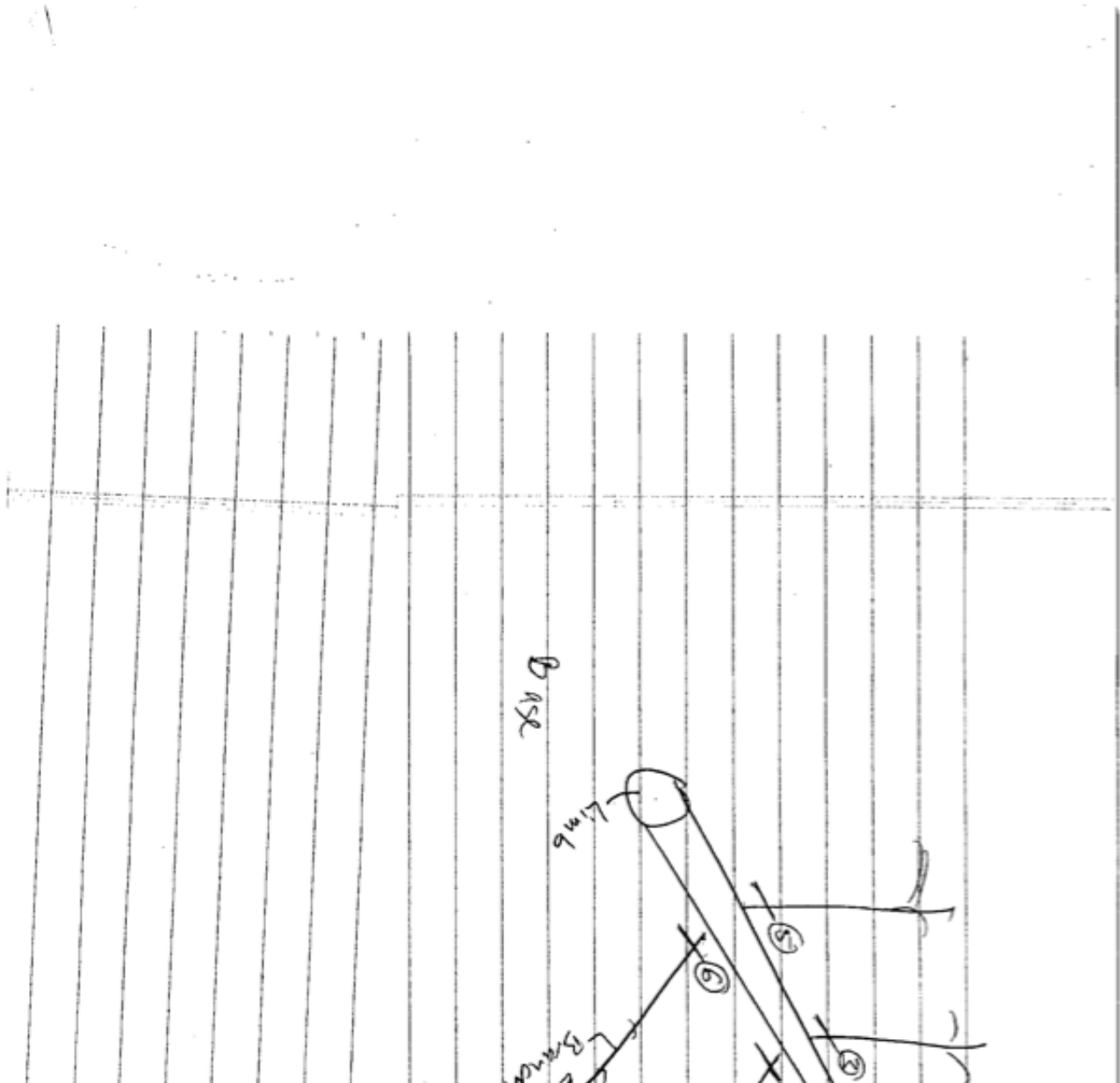
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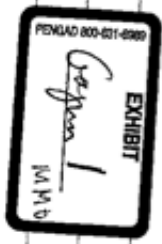
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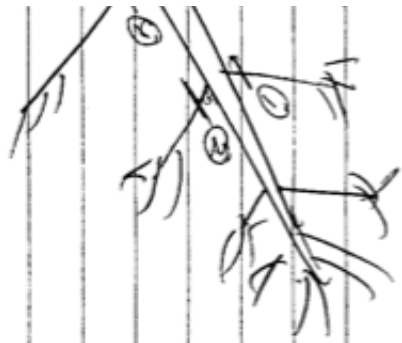
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<Mast.Letter.073012.pdf><Misc Telephone Conf Notes.pdf>






2



Xop



Photos of
Injury.pdf

From: Julia Williams juliawilliams@clintonlaw.net 
Subject: Re: Dulberg (AOIC Claim No. 13-2779-11)
Date: December 23, 2019 at 4:31 PM
To: Chantel Bielskis CB@cicerofrance.com



Thanks Chantel. No need to apologize for the delay. Enjoy your holidays!

Best Regards,

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<Correspondence Part I.pdf><Correspondence Part II.pdf><Mast.Letter.071513.pdf>
<Mast.Letter.073012.pdf><Misc Telephone Conf Notes.pdf>

<Gagnon Dep Exhibit 1.pdf><Photos of Injury.pdf>

From: Chantel Bielskis CB@cicerofrance.com 
Subject: RE: Dulberg (AOIC Claim No. 13-2779-11)
Date: February 19, 2020 at 1:18 PM
To: Julia Williams juliawilliams@clintonlaw.net

CB

Hello Julia –

Attached, please see the letter going out to your firm today regarding my subpoena response. Please let me know if you need anything further regarding the subpoena. Also, if possible, I would appreciate you letting me know when this case is resolved.

Have a good day.

Sincerely,

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From: Julia Williams <juliawilliams@clintonlaw.net>
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To: Ed Clinton <ed@clintonlaw.net>

Hello Ed –

I am working on your subpoena for records. Is it safe to assume you have the entire court file or are you asking me to produce all of the pleadings I have as well? For reference, that portion of the file is approximately 200 pages by itself. Please advise.

Sincerely,

Chantel R. Bielskis
Attorney at Law
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Rockford, IL 61114
815.226.7700
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From: Ed Clinton [<mailto:ed@clintonlaw.net>]
Sent: Friday, November 22, 2019 4:21 PM
To: Chantel Bielskis
Cc: Julia Williams
Subject: Dulberg

Chantal,

The 14 day extension you requested is fine,

Ed Clinton, jr.

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