

5t+IN THE CIRCUIT COURT OF THE TWENTY-SECOND JUDICIAL CIRCUIT
McHENRY COUNTY, ILLINOIS

Notes to Julia:

A. 5ttn should be removed from the above line

1. Produce any and all records regarding the legal representation provided to you by the Law Offices of Thomas J. Popovich, P.C. ("Popovich") and/or Hans Mast ("Mast") in connection with the underlying case, against William McGuire, Caroline McGuire, and David Gagnon.

RESPONSE:

All relevant documents in Plaintiff's possession will be produced.

Notes to Julia:

A. This should read; All relevant documents in Plaintiff's possession have been produced and will be updated if more become available.

2. Produce any and all correspondence, agreements, draft agreements, emails, letters, and any other documents between you and Popovich or Mast in connection with the legal representation in the underlying case.

RESPONSE:

All relevant documents in Plaintiff's possession will be produced.

Notes to Julia:

A. This should read; All relevant documents in Plaintiff's possession have been produced and will be updated if more become available.

3. Produce any and all correspondence between you and any defendant from the underlying case, including Caroline McGuire, William McGuire, and David Gagnon, from June 28, 2011 to the present time.

RESPONSE:

All relevant documents in Plaintiff's possession will be produced.

Notes to Julia:

A. This should read; All relevant documents in Plaintiff's possession have been produced and will be updated if more become available.

6. Any and all pleadings and discovery (including deposition transcripts) created, filed, served, and received in the underlying case prior and subsequent to Popovich and Mast's withdrawal as your attorneys, including but not limited to any "high/low" agreement and any arbitration award, arbitration agreement, and any other documentation relating to any arbitration in the underlying case.

RESPONSE:

All relevant documents in Plaintiff's possession will be produced.

Notes to Julia:

A. This should read; All relevant documents in Plaintiff's possession have been produced and will be updated if more become available.

7. Produce any and all documents relating in any way to your claimed damages in the instant case, including but not limited to any special damages, such as medical bills, medical records, costs, invoices, and lost wages.

RESPONSE:

All relevant documents in Plaintiff's possession will be produced.

Notes to Julia:

A. This should read; All relevant documents in Plaintiff's possession have been produced and will be updated if more become available.

9. Produce any and all state and federal tax returns you filed in the ten year period prior to the accident of June 28, 2011.

RESPONSE:

All relevant documents in Plaintiff's possession will be produced.

Notes to Julia:

A. This should read; All relevant documents in Plaintiff's possession have been produced and will be updated if more become available.

10. Produce any and all documentation of lost wages as alleged in paragraph 30 of your second amended complaint, including but not limited to any employment agreement, wage records, paystubs, cancelled checks, and any other documentation reflecting income in the ten year period prior to the date of the accident.

RESPONSE:

All relevant documents in Plaintiff's possession will be produced.

Notes to Julia:

A. This should read; All relevant documents in Plaintiff's possession have been produced and will be updated if more become available.

11. Produce copies of any and all settlement documents, settlement agreements, cancelled checks or other payments made in connection with any settlement reached in the underlying case, including payment of approximately \$300,000 as alleged in paragraph 54 of your supplemental complaint.

RESPONSE:

All relevant documents in Plaintiff's possession will be produced.

Notes to Julia:

A. This should read; All relevant documents in Plaintiff's possession have been produced and will be updated if more become available.