

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

PAUL DULBERG,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 17 LA 377
	)	
THE LAW OFFICE OF THOMAS J.	)	
POPOVICH, P.C. and HANS MAST,	)	
	)	
Defendants.	)	

**DULBERG'S RESPONSES TO DEFENDANTS THE LAW OFFICES  
OF THOMAS J. POPVICH, P.C., s REQUESTS FOR PRODUCTION TO PLAINTIFF**

Paul Dulberg, by and through his attorneys, The Clinton Law Firm, LLC, pursuant to the provisions of Illinois Supreme Court Rule 214, responds to Defendants, The Law Offices of Thomas J. Popovich, P.C.'s Requests for Production To Plaintiff as follows:

**PRODUCTION REQUESTS**

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.

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.

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.

4. Produce any and all documentation relating to legal representation of you by any successor counsel in the underlying case.

**RESPONSE:** Objection. Attorney Client Privilege.

5. Any and all engagement or disengagement letters or agreements between you and any attorney relative to legal services in the underlying case.

**RESPONSE:** Objection. Attorney Client Privilege.

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.

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.

8. Produce a privilege log identifying the creator and recipient of any document withheld, the basis for any claimed privilege, the date the document was created, and the date any recipient received the document.

**RESPONSE:** Plaintiff is only withholding attorney client communication between his successor counsel.

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.

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.

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.

12. An affidavit signed you (and not your attorney) pursuant to Illinois Supreme Court Rule 214, certifying that your response is complete in accordance with each request contained herein.

**RESPONSE:** Produced.

Respectfully submitted,

/s/ Julia C. Williams

Julia C. Williams

One of Plaintiff's Attorneys

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### VERIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure and in compliance with Supreme Court Rule 214, the undersigned certifies that the statements set forth in this instrument are true and correct, and that the production is complete, except as otherwise noted therein, and except as to matters therein stated to be on information and belief as to such matters the undersigned certifies as aforesaid that s/he verily believes the same to be true.

  
Paul Dulberg