

STATE OF ILLINOIS  
IN THE CIRCUIT COURT OF THE 22<sup>ND</sup> JUDICIAL CIRCUIT  
COUNTY OF McHENRY

PAUL DULBERG,	)	
	)	
Plaintiff,	)	Case No. 12 LA 178
	)	
vs.	)	
	)	
DAVID GAGNON, Individually, and as	)	
Agent of CAROLINE MCGUIRE and BILL	)	
MCGUIRE, and CAROLINE MCGUIRE	)	
and BILL MCGUIRE, Individually,	)	
	)	
Defendants.	)	

**ANSWER TO DEFENDANT DAVID GAGNON'S CONSOLIDATED NOTICE TO  
PRODUCE PURSUANT TO SUPREME COURT RULE 214 AND SUPREME COURT  
RULE 237 BY DEFENDANTS BILL MCGUIRE AND CAROLINE MCGUIRE**

TO: Mr. David Gagnon  
c/o Perry Accardo  
Law Office of M. Gerard Gregoire  
200 N LaSalle Street, Ste 2650  
Chicago, IL 60601-1092

Defendants, BILL MCGUIRE AND CAROLYN MCGUIRE (improperly named Caroline),  
by and through their attorneys, Cicero, France, Barch & Alexander, PC, and for their Answer to  
Defendant's, David Gagnon, Consolidated Notice to Produce Pursuant to Supreme Court Rule 214  
and Supreme Court Rule 237, state as follows:

1. Produce for the purpose of adverse examination at trial and arbitration, pursuant to 735  
ILCS 5/2-1102, Plaintiff Hans A. Mast.

**ANSWER:** No answer required.

2. All copies of damage bills, estimates of repair or replacement for any property claimed to  
have been damaged in the occurrence in question, including, but not limited to, estimates,  
cancelled checks, receipts or other documentary evidence representing payment for such  
damages.

**ANSWER:** None known to answering Defendant.

3. All photographs or video, images, of any of the parties to this suit, of vehicles, property, or physical objects involved in the occurrence, scene of the occurrence. For each item produced, identify the date the item was originally produced, the identity and contact information of the photographer, videographer, filmmaker or other individual who produced the item described and the identity and contact information of the current custodian of the original item described.

**ANSWER:** None, other than photo copies that accompanied Plaintiff's production response to Defendants.

4. Any statement, memoranda, or other writing recording of any interview with any party, other person, or witness who has knowledge of the facts alleged in the Complaint or who has opinions relating to any of the issues alleged in the Complaint, except those protected by privilege.

**ANSWER:** None in answering Defendants' possession other than the typed statement of David Gagnon, which was included in Plaintiff's production response to Defendants (see attached).

5. Any releases, hold harmless, or any other type of settlement agreements between Plaintiff(s) and any other party which may have been responsible for the damages claimed by Plaintiff(s).

**ANSWER:** None known to answering Defendants.

6. All policies of insurance providing collateral source of payments to the Plaintiff(s), including, but not limited to, medical payment insurance, disability insurance, PIP insurance, and/or employment related insurance. Please attach any/all policies of insurance referred to above.

**ANSWER:** Requested. Will produce upon receipt.

7. Any and all medical hospital, medication, therapeutic, clinical records, bills and reports. Any Social Security records relating to applications for disability claims, along with documentary evidence.

**ANSWER:** None, other than those included in Plaintiff production response to Defendants

16. If the party or his attorney responding to this Request to produce knows of the existence or location of any document or items requested, even though they are not within the current possession of the party or his/her attorney, identify the location, the custodian and the nature of the document or items.
- a. The date on which said document or tangible object was created;
  - b. The name and last known address of the author of the document or maker of the tangible object;
  - c. The name and last known address of the recipient of the document or tangible object or item;
  - d. A brief description of the subject matter of the document or description of the tangible object or item;
  - e. The basis of the claim of privilege.

**ANSWER:** Not known to answering Defendants.

17. An affidavit of the responding party or their attorney stating whether the production is complete in accordance with this Request pursuant to Supreme Court Rule 214 and Supreme Court Rule 237.

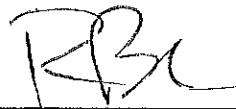
**ANSWER:** No answer required.

18. Copies of all individual United States and applicable individual state income tax returns, including any and all W2 forms and supporting documents for the year before, the year of and each year after the occurrence at issue. Further if any claim of lost income is based on self-employment, produce and all business and accounting records, including the name, address and telephone number of the accountant keeping or maintaining said records, for the year before, the year of and each year after the occurrence at issue.

**ANSWER:** Objection. This request seeks information which is irrelevant. Answering further, the Defendants have not injected their personal income as an issue in the case.

CAROLYN MCGUIRE and BILL MCGUIRE,  
Defendants, by their attorneys,  
CICERO, FRANCE, BARCH & ALEXANDER, P.C.,

By



RONALD A. BARCH (6209572)

Cicero, France, Barch & Alexander, P.C.  
6323 East Riverside Blvd.  
Rockford, IL 61114  
815/226-7700

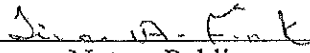
STATE OF ILLINOIS                    )  
  ) SS  
COUNTY OF WINNEBAGO            )

RONALD A. BARCH, being first duly sworn on oath, deposes and states that he is one of the attorneys for the Defendants, BILL McGUIRE and CAROLYN McGUIRE, that he has read the foregoing Answer signed by him; that the allegations as to insufficient knowledge are true to the best of his knowledge and belief.



\_\_\_\_\_  
RONALD A. BARCH

Subscribed and sworn to before  
me on 9-27-12.

  
\_\_\_\_\_  
Notary Public




**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing document was  
served upon:

Attorney Perry A. Accardo  
Law Office of M. Gerard Gregoire  
200 N. LaSalle St., Ste 2650  
Chicago, IL 60601-1092

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

by depositing the same in the United States Post Office Box addressed as above, postage prepaid,  
at Rockford, Illinois, at 5:00 o'clock p.m. on 9/27/12.



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Cicero, France, Barch & Alexander, P.C.  
6323 East Riverside Blvd.  
Rockford, IL 61114  
815/226-7700  
815/226-7701 (fax)