

**IN THE CIRCUIT COURT OF THE TWENTY-SECOND JUDICIAL DISTRICT  
McHENRY COUNTY, ILLINOIS**

PAUL DULBERG,

Plaintiff(s),

vs.

DAVID GAGNON, Individually, and as  
Agent of CAROLINE MCGUIRE and  
BILL MCGUIRE, and CAROLINE  
MCGUIRE and BILL MCGUIRE,  
Individually,

Defendant(s).

CASE NO. 12LA000178

**FILED**

**JUN 06 2016**

KATHERINE M. KEEFE  
McHENRY CTY. CIR. CLK.

**NOTICE OF MOTION**

TO: Baudin & Baudin  
2100 N. Huntington Drive, STE C  
Algonquin, IL 60102

On 6/13/16, at 9:00 a.m. or as soon thereafter as counsel may be heard, I shall appear before the Honorable Judge , or any judge sitting in Room 201, of the McHenry County Courthouse\*, 2200 N Seminary Ave, Woodstock, Illinois, and then and there move(s) this Honorable Court to bar new opinions and medical care disclosed by Dr. Kujawa and Compel Plaintiff's Expert's Deposition.

LAW OFFICE OF STEVEN A. LIHOSIT

Firm No.: **19859**

E-MAIL ADDRESS: ILLINOISLEGAL@ALLSTATE.COM

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Attorney for Defendant(s), David Gagnon

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**PROOF OF SERVICE BY MAIL**

I, SHOSHAN E. REDDINGTON, certify that I served this notice by mailing a copy to the above named attorney(s), at the above address(s), and depositing the same in the U.S. mail at 200 N. LaSalle Street, Suite 2550, Chicago, Illinois, at 4:30 p.m., on 6/6/16, with proper postage prepaid.

Signature