

STATE OF ILLINOIS)
) SS
 COUNTY OF MCHENRY)

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.

**MOTION TO BAR NEW OPINIONS/MEDICAL TREATMENT OF DR. KUJAWA AND
 COMPEL PLAINTIFF EXPERT DEPOSITION**

Defendant(s), David Gagnon, by and through the undersigned counsel, move(s) this Court for the entry of an Order to bar new medical opinions and treatment by Dr. Kujawa and compel discovery and deposition of plaintiff's new expert and as grounds therefore state(s):

1. Dr. Kujawa's discovery deposition was taken on 7/23/14 and plaintiff's last medical treatment at that time was in May 2014 with Dr. Kujawa.

2. Plaintiff recently made a policy demand in this matter and based that demand on Dr. Kujawa's new opinions as to medical care that plaintiff continued to receive from her that were not disclosed and the opinions that medical care will be necessitated for the remainder of plaintiff's life at an estimated cost of almost \$ 300,000.00.

3. Plaintiff recently disclosed a new expert arborist opinion and defense requests the opportunity to take the discovery deposition of the expert and receive answers to written discovery requests.

Wherefore, defendant requests that this Honorable Court bar the new opinions and medical care of Dr. Kujawa as not being properly disclosed and seasonally supplemented and for the discovery deposition and answers to discovery from plaintiff's new expert arborist or for whatever other relief the Court deems appropriate.

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A handwritten signature in black ink, appearing to read "Shoshan E. Reddington", with a long horizontal line extending to the right.

By: _____

SHOSHAN E. REDDINGTON

Firm No.: **19859**

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Attorney for Defendant(s):

David Gagnon