**Supplemental Interrogatories:**

Opposing counsel requested certain supplemental information to questions 12, 19, 26, and 27 of the interrogatories. I have draft supplemental responses which are attached here for your review.

Please note that I believe that you first realized the legal malpractice case against Mr. Mast and the Popovich firm was viable when you received Dr. Bobby Langford’s report. The report is dated February 2016, but in the Complaint we allege that you came to learn of the legal malpractice in December 2016. Please verify the date that you learned of the legal malpractice case. Was it in fact with Dr. Langford’s report in February 2016? If not, please explain. If so, we can amend the complaint to make that consistent.

**Discovery Answers from Defendant:**

You have the documents they sent. Their written responses are attached or will be sent by separate email.

I requested information on the blacked out pages and waiting for a response on those.

I reviewed documents 192 and 1207 that you noted. I believe it is prudent to question Mast further in a deposition about the settlement discussions, both with you and opposing counsel.

**Discovery Answers we sent to Defendant:**

Our responses and documents are attached or will be sent by separate email. L

**Subpoenas:**

Mary is working on the issuing various subpoenas. She will send copies to you.

**Punitive Damages:**

Punitive Damages are not available in this case. The statute does not limit it to the attorney or the firm. It limits the award of punitive damages based upon the cause of action. Here, your claims are based in legal malpractice and arise from negligent conduct of your attorney.

   (735 ILCS 5/2-1115) (from Ch. 110, par. 2-1115)
    Sec. 2-1115. Punitive damages not recoverable in healing art and legal malpractice cases. In all cases, whether in tort, contract or otherwise, in which the plaintiff seeks damages by reason of legal, medical, hospital, or other healing art malpractice, no punitive, exemplary, vindictive or aggravated damages shall be allowed.
(Source: P.A. 84-7.)