Subpeona’s

 EMAIL TO MARY ON 10/18 to send various subpoenas.

1. McGuire’s Attorney Barch

Ronald Barch,

Cicero, France, Barch & Alexander PC

6323 E Riverside Blvd.

Rockford, IL 61114

1. Auto Owners Insurance for communication in underlying case
2. Gagnon’s Attorney Accardo and Shoshaun

There is no attorney named Shoshaun licensed in Illinois.

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

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| Last updated: 12/3/2013**Law Office of Steven A. Lihosit**Corporationsliho@allstate.com |

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| PROFESSIONAL INFORMATION |
| [Law Office of Steven A. Lihosit](https://www.iadtc.org/search/search.asp?txt_employName=Law+Office+of+Steven+A%2E+Lihosit)200 North LaSalle StreetSuite 2550[Chicago](https://www.iadtc.org/search/search.asp?txt_city=Chicago)[Illinois](https://www.iadtc.org/search/search.asp?txt_state=Illinois)60601  [United States](https://www.iadtc.org/search/search.asp?txt_country=United+States) |  |

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1. Allstate insurance
2. BK Trustee; Paul Dulberg Case no. 18-83578

Interrogatories:

#12,19,26 and 27

Document production, identify documents.

Discovery from Popvich Review.

BK information.

DRAFTED.

 **12. Identify and describe each of your employers in the ten year period prior to the accident of June 28, 2011, including any self-employment. For each employer, identify your wage rate or salary, your title, your job description, your required duties, and your income for the ten year period prior to the accident in question.**

**SUPPLEMENT TO ORIGINAL ANSWER:**

1. 1999-2011 Sharp Printing, Inc., 4606 Hayden Ct., McHenry, IL 60051

Paul Dulberg was an owner and operator of Sharp Printing, Inc. along with his two partners Scott Dulberg and Michael McArtor. Dulberg was employed by Sharp Printing, Inc.

Paul Dulberg was the President, salesperson, graphic designer, 8 color screen print pressman, handled fulfillment, shipping & receiving, as well as other day to day operations of the company.

For income, see tax returns.

Sharp Printing, Inc. operated out of the lower floor of Paul Dulberg’s personal residence and paid all utilities bills, including garbage, water, natural gas, electric, internet, phone, and cable. The approximate value is $650 per month.

 **19. As a result of your personal injuries from the underlying case, were you unable to work? If so, state:**

* 1. **The name and address of your employer, if any, at the time of the occurrence, your wage and/or salary, and the name of your supervisor and/or foreperson;**
	2. **The date or inclusive dates on which you were unable to work;**
	3. **The amount of wage and/or income lost by you; and**
	4. **The name and address of your present employer and/or wage and/or salary.**

**SUPPLEMENT TO ORIGINAL ANSWER:**

Paul Dulberg was self-employed by Sharp Printing and unable to work after the accident. He was also an independent contractor with Juskie Printing. He has not been employed since the date of the accident. See tax returns for lost wages. See SSDI documents for current income. Prior to the accident, in 2010, Dulberg earned approximately $16,000 in employment or business income. In 2011, because of the accident, Dulberg only earned approximately $8,000 in employment or business income.

**26. Identify and describe the false and misleading information Mast and Popovich provided to you, and explain how you realized for the first time in December of 2016 that the information was false and misleading and the dismissal of the McGuires was a serious and substantial mistake, as alleged in paragraph 56 of your second amended complaint**

**SUPPLEMENT TO ORIGINAL ANSWER:**

Dulberg learned from expert Dr. Bobby Landford that the McGuire’s permitted an individual who did not understand how to utilize a chainsaw, despite the warnings in the owner’s manual. Based upon Dr. Landford’s report, Dulberg learned that he could have prevailed on his claims against the McGuire’s.

The original report was dated February 17, 2016.

**27. Identify and describe the expert opinions provided to you in December 2016 as alleged in paragraph 57 of your second amended complaint, including the identity of the expert, the opinions, and any other information provided by the expert which caused you to learn in the summer of 2016 and become reasonably aware that Mast and Popovich did not properly represent you.**

**SUPPLEMENT TO ORIGINAL ANSWER:**

Dulberg learned from expert Dr. Bobby Landford that the McGuire’s permitted an individual who did not understand how to utilize a chainsaw, despite the warnings in the owner’s manual. Based upon Dr. Landford’s report, Dulberg learned that he could have prevailed on his claims against the McGuire’s.

The original report was dated February 17, 2016.