IN THE CIRCUIT COURT OF THE TWENTY-SECOND JUDICIAL CIRCUIT

MCHENRY COUNTY, ILLINOIS

PAUL DULBERG, )

PLAINTIFF, )

)

v. ) Case No. 17 LA 377

)

THE LAW OFFICES OF THOMAS POPOVICH, )

and HANS MAST, )

DEFENDANTS. )

**PLAINTIFFS’ RULE 213(F) INTERROGATORIES TO DEFENDANT**

Plaintiff Paul Dulberg, by and through his attorneys, The Clinton Law Firm, request that Defendants answer 213(f) interrogatories within 28 days as provided by Rule 213:

1. Please identify the name, address, and telephone number of every individual “Lay Witness” who will testify at trial on behalf of the Plaintiff, and identify the subject matter of each witness’ testimony.

**ANSWER:**

1. Please identify the name, address and telephone number of every independent Expert Witness who will testify at trial on behalf of the Plaintiff, and identify the subject matter of each witness’ testimony.

**ANSWER:**

1. Please identify the name, address, and telephone number of every Controlled Expert Witness who will testify at trial on behalf of Plaintiff, and for each Controlled Expert Witness, please identify:
2. the subject matter on which the witness will testify;
3. the conclusions and opinions of the witness and the bases therefor;
4. the qualifications of the witness; and
5. any reports prepared by the witness about the case.

**ANSWER:**

Dated: March 22, 2019

Respectfully submitted

/s/ Julia C. Williams

Julia C. Williams

Edward X. Clinton, Jr., ARDC No. 6206773

Julia C. Williams, ARDC No. 6296386

The Clinton Law Firm

111 W. Washington, Ste. 1437

Chicago, IL 60602

312.357.1515

[ed@clintonlaw.net](mailto:ed@clintonlaw.net)

[juliawilliams@clintonlaw.net](mailto:juliawilliams@clintonlaw.net)