IN THE CIRCUIT COURT OF THE TWENTY-SECOND JUDICIAL CIRCUIT

McHENRY COUNTY, ILLINOIS

PAUL DULBERG, )

 )

 Plaintiff, )

 )

v. ) Case No. 17 LA 377

 )

THE LAW OFFICE OF THOMAS J. )

POPOVICH, P.C. and HANS MAST, )

 )

 Defendants. )

**DULBERG’S RESPONSES TO DEFENDANTS THE LAW OFFICES**

**OF THOMAS J. REQUESTS RULE 237 NOTICE TO PRODUCE PAUL DULBERG**

Paul Dulberg, by and through his attorneys, The Clinton Law Firm, LLC, pursuant to the provisions of Illinois Supreme Court Rule 214, responds to Defendants, The Law Offices of Thomas J. Popovich, P.C.’s Rule 237 Notice to Produce Paul Dulberg as follows:

# NOTICE TO PRODUCE

1. The following witnesses for trial:
	1. Paul Dulberg.

**RESPONSE:** Paul Dulberg will be produced at trial.

1. The statements, oral or written, of any party.

**RESPONSE:**

1. The full name and complete last known address of every witness to the occurrence(s) or transactions complained of, as well as all pre-occurrence and post-occurrence witnesses.

**RESPONSE:**

1. The full name and complete last known address of all other persons who have knowledge of the matter pled or of relevant facts.

**RESPONSE:**

1. All statements of parties and witnesses, whether signed or unsigned, or compiled in a summary fashion, relating to the issues of liability and damages or to the issue of impeachment.

**RESPONSE:**

1. Any and all technical literature including articles in any professional or technical journals, textbooks, encyclopedias or any and all other published documents to be used at trial for any purpose, including impeachment.

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**RESPONSE:**

1. With respect to any opinion witness to be called at trial, please provide the following:
	1. A current curriculum vitae for each opinion witness;
	2. All notes, memoranda, correspondence, or any all other written information submitted to or prepared by each opinion witness;
	3. A list of any and all documents reviewed by each opinion witness;
	4. Copy of all statutes, ordinances, journals, rules, regulations, manuals, standards, by-laws or other guidelines of any governmental or government affiliated agency or of any professional, licensing, review authority or any other organization, which will be used by each opinion witness or upon which each opinion witness may base opinion testimony; and
	5. Any and all bills of any kind or nature generated by each opinion witness with regard to the work of each opinion witness on this case.

**RESPONSE:**

1. Each and every trial subpoena issued in this case on behalf of the plaintiff.

**RESPONSE:**

1. A list of all witnesses, including their full names, last known addresses, social security numbers, and telephone numbers, who may be called by you to testify in this matter during your case in chief.

**RESPONSE:**

1. All deposition exhibits.

**RESPONSE:**

1. Any and all exhibits, whether for demonstrative or evidentiary purposes, which will be used at trial, including photographs, diagrams, drawings, depictions, or overlays.

**RESPONSE:**

1. Any incident reports or reports of investigation regarding plaintiff’s alleged damages allegedly following there from.

**RESPONSE:**

1. All business records obtained through discovery or investigation, including those produced to you by others in this cause.

**RESPONSE:**

1. Any and all rules, regulations, guidelines, or policies of any public authority or licensing authority which will be relied upon at trial.

**RESPONSE:**

1. Any and all appraisals, medical records, diagnostic studies, bills, invoices, investigative reports, settlement agreements, mediation, or arbitration agreements, surveillance reports or videotapes, and inspection reports pertaining to the damages sustained by the plaintiff, including any factual material concerning the date(s) of the alleged malfeasance which is the subject matter of this lawsuit, including the underlying case.

**RESPONSE:**

1. Any and all correspondence to and from each retained opinion witness, up to the present time.

**RESPONSE:**

1. Any and all invoices, bills, receipts and timesheets relating to the work and time spent on this matter by each retained opinion witness.

 **RESPONSE:**

 Respectfully submitted,

 /s/ Julia C. Williams

 One of Plaintiff’s Attorneys

Edward X. Clinton, Jr.

Julia C. Williams

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