

**THE UNITED STATES OF AMERICA
IN THE CIRCUIT COURT OF THE TWENTY SECOND JUDICIAL CIRCUIT
McHENRY COUNTY, ILLINOIS**

PAUL DULBERG,)	
Plaintiff,)	Case No.: 2017 LA 377
v.)	
)	
THE LAW OFFICES OF THOMAS J.)	
POPOVICH, P.C. and HANS MAST,)	
)	
Defendants.)	

PLAINTIFF'S 213F (1), (2) & (3) INTERROGATORIES TO DEFENDANTS

To: George Flynn (gflynn@clausen.com)
Clausen Miller, P.C.
10 South LaSalle Street, 16th Floor
Chicago IL 60603

NOW COMES your Plaintiff, PAUL DULBERG, by and through his attorneys THE GOOCH FIRM, and for his Supreme Court Rule 213(f) Interrogatories Propounded to the Defendants, THE LAW OFFICES OF THOMAS J. POPOVICH and HANS MAST, states as follows:

1. Pursuant to Illinois Supreme Court Rule 213(f)(1), provide the following of each witness who will testify at Trial as a lay witness:

- (a) his or her name, address, telephone number, occupation, and current employment;
- (b) the subject matter of his or her expertise;
- (c) his or her educational background, academic qualifications, employment history, employment experience, and any other matters which you contend qualify him or her as an expert;
- (d) the identification of any and all statements, reports, letters, tape recordings, photographs, memoranda, or

documentation of any type furnished to or obtained by said expert or experts;

- (e) the substance of all facts and opinions which he or she could testify, if called as a witness;
- (f) the bases and grounds for each such opinion;
- (g) the identification of all documents and other tangible evidence relied upon by the opinion witness as a basis for his or her opinion;
- (h) the contractual agreement for his or her retention in this case, including the amount of his or her compensation, whether the compensation has already been paid, and whether any compensation is contingent on the outcome of this litigation;
- (i) the identification of each book, article, paper, or public statement by the opinion witness which relates to the subject matter of his or her expertise; and
- (j) the name and document number of each judicial, administrative or legislative proceeding which he or she has testified or otherwise (as by deposition or affidavit) given evidence within the last ten (10) years, plus the name of the court or other body before which the evidence was given.

ANSWER:

2. Pursuant to Illinois Supreme Court Rule 213(f)(2), provide the following of each witness who will testify at Trial as an independent expert witness:

- (a) his or her name, address, telephone number, occupation, and current employment;
- (b) the subject matter of his or her expertise;
- (c) his or her educational background, academic qualifications, employment history, employment experience, and any other matters which you contend qualify him or her as an expert;
- (d) the identification of any and all statements, reports, letters, tape recordings, photographs, memoranda, or

documentation of any type furnished to or obtained by said expert or experts;

- (e) the substance of all facts and opinions which he or she could testify, if called as a witness;
- (f) the bases and grounds for each such opinion;
- (g) the identification of all documents and other tangible evidence relied upon by the opinion witness as a basis for his or her opinion;
- (h) the contractual agreement for his or her retention in this case, including the amount of his or her compensation, whether the compensation has already been paid, and whether any compensation is contingent on the outcome of this litigation;
- (i) the identification of each book, article, paper, or public statement by the opinion witness which relates to the subject matter of his or her expertise; and
- (j) the name and document number of each judicial, administrative or legislative proceeding which he or she has testified or otherwise (as by deposition or affidavit) given evidence within the last ten (10) years, plus the name of the court or other body before which the evidence was given.

ANSWER:

3. Pursuant to Illinois Supreme Court Rule 213(f)(3), provide the following of each witness who will testify at Trial as a controlled expert witness:

- (a) his or her name, address, telephone number, occupation, and current employment;
- (b) the subject matter of his or her expertise;
- (c) his or her educational background, academic qualifications, employment history, employment experience, and any other matters which you contend qualify him or her as an expert;
- (d) the identification of any and all statements, reports, letters, tape recordings, photographs, memoranda, or

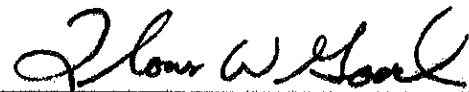
documentation of any type furnished to or obtained by said expert or experts;

- (e) the substance of all facts and opinions which he or she could testify, if called as a witness;
- (f) the bases and grounds for each such opinion;
- (g) the identification of all documents and other tangible evidence relied upon by the opinion witness as a basis for his or her opinion;
- (h) the contractual agreement for his or her retention in this case, including the amount of his or her compensation, whether the compensation has already been paid, and whether any compensation is contingent on the outcome of this litigation;
- (i) the identification of each book, article, paper, or public statement by the opinion witness which relates to the subject matter of his or her expertise; and
- (j) the name and document number of each judicial, administrative or legislative proceeding which he or she has testified or otherwise (as by deposition or affidavit) given evidence within the last ten (10) years, plus the name of the court or other body before which the evidence was given.

ANSWER:

Respectfully submitted by

THE GOOCH FIRM on behalf of Plaintiff,
PAUL DULBERG,



THOMAS W. GOOCH, III

THE GOOCH FIRM
209 S. Main Street
Wauconda, IL 60084
847-526-0110
gooch@goochfirm.com
office@goochfirm.com
ARDC No. 3123355