

**IN THE TWENTY-SECOND JUDICIAL CIRCUIT
MCHENRY COUNTY, ILLINOIS**

PAUL DULBERG,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	CASE NO. 17 LA 377
	)	
THE LAW OFFICES OF THOMAS J.	)	JUDGE THOMAS A. MEYER
POPOVICH, P.C., and HANS MAST,	)	
	)	
Defendants.	)	

SUBPOENA FOR DOCUMENTS
(THIS SUBPOENA IS FOR RECORDS ONLY.)

TO: EDWARD X. CLINTON,
 Individually and as Manager of
 Clinton Law Firm, LLC
 111 West Washington Street Suite 1437
 Chicago, Illinois 60602-2708

YOU ARE COMMANDED to produce responsive documents, Electronically Stored Information (ESI) including but not limited to writings, drawings, graphs, charts, photographs, images, sound recordings, and other data or data compilations from which ESI can be obtained, voicemails, text messages, internet history logs, information stored on backup tapes, social media profiles and activity, recordings of conference calls or videoconferences, videos, data from Workplace Collaboration Tools (WCT) or devices connected to the Internet of Things (IoT), communications conducted using ephemeral messaging applications, geolocation data that can reveal the precise location of a device and the individual using the device or objects in response

to the requests below on August 31, 2022, at 1:00 p.m. at the Law Office of Alphonse A. Talarico, 707 Skokie Boulevard Suite 600, Northbrook, Illinois 60062.

You are subpoenaed by the undersigned attorney, and unless excused from this subpoena by this attorney or the court, you must respond to this subpoena as directed. If you fail to respond to this subpoena, you may be in contempt of court.

DEFINITIONS:

I) Electronically Stored Information (ESI) means information that is stored in or on any electronic medium.

INSTRUCTIONS:

A) Please respond in numerical order stating the number and in chronological order therein.

B) Electronically Stored Information (ESI) shall be produced as exact duplicates of the original source files, in original format as source files, also including ‘Native,’ ‘Image,’ and ‘Load’ files.

C) The required time period begins March 2, 2020 and ends on April 29, 2022.

D) Please see **COMPLIANCE WITH SUBPOENA** below.

PLEASE TAKE FURTHER NOTICE that, pursuant to this subpoena, Edward X. Clinton is requested to produce the following documents, Electronically Stored Information (ESI), or objects in response to the requests on August 31, 2022, at the Law Office of Alphonse A. Talarico, 707 Skokie Boulevard Suite 600, Northbrook, Illinois 60062:

1. The original transcript stamped “Original” of the discovery deposition of Hans Mast taken in this matter on June 25, 2020 including all pages, all indexes, all exhibits and all stenographic/shorthand notes.
2. An exact duplicate of the original transcript stamped “Copy” of the discovery deposition of Hans Mast taken on June 25, 2020, to include but not limited to: all pages, all indexes, all

exhibits and all stenographic/shorthand notes. Please note that the copy demanded is a contemporaneous copy issued by U.S. Legal Support.

3. An exact duplicate of the original transcript stamped "Copy" in condensed format (mini) of the discovery deposition of Hans Mast taken on June 25, 2020, to include but not limited to: all pages, all indexes, all exhibits and all stenographic/shorthand notes. Please note that the condensed transcript demanded is a contemporaneous version issued by U.S. Legal Support.
4. All documents and ESI to include but not limited to: all text messages, emails, messages, notes, and reports taken, created, or received concerning the discovery deposition of Hans Mast taken on June 25, 2020.
5. All documents and ESI to include but not limited to: all text messages, emails, messages, notes, and reports taken, created, or received concerning Exhibit 12 of the discovery deposition of Hans Mast taken on June 25, 2020.
6. All documents and ESI to include but not limited to: all text messages, emails, messages, notes, and reports taken, created, or received concerning the exhibit titled "Legal Research" of discovery deposition of Hans Mast taken on June 25, 2020.
7. All documents and ESI to include but not limited to: all text messages, emails, messages, notes, and reports taken, created, or received concerning Exhibits 1-11 and 13-15 of the discovery deposition of Hans Mast taken on June 25, 2020.

Please note that the appearance of the respondent is excused, and no deposition will be taken, if the documents specified above are produced on or before August 26, 2022

NOTE TO WITNESS: Please contact attorney Alphonse A, Talarico at (312) 808-1410 for information as to the reimbursement of additional charges for production incurred by the respondent.

NOTE TO WITNESS: Enclosed with this subpoena is a check for statutory witness fees and mileage reimbursement in the amount of \$29.00 plus \$25.00 for production costs. The total money forwarded is \$54.00.

Dated: August 2, 2022

By:

/s/ Alphonse A. Talarico

Alphonse A. Talarico 6184530

Law Office of Alphonse A. Talarico

707 Skokie Boulevard #600

Northbrook, Illinois, 60062

Tel: (312) 808-1410

contact@lawofficeofalphonsetalarico.com

Attorney for Plaintiff Paul Dulberg

PROOF OF SERVICE

Gazelle Process & Investigations PLLC #117-001853 on oath states:

I am over the age of 18 and not a party to this case.

I served the foregoing Subpoena for Documents on Edward X. Clinton as follows:

By leaving a copy of the Subpoena for Documents with _____
personally at _____ on _____, 2022
at the hour of _____.m.

I also enclosed a check for \$54.00 for the witness and mileage fees plus production costs.

Pursuant to 735 ILCS 5/1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that the signer verily believes the same to be true.

Gazelle Process & Investigations PLLC #117-001853

COMPLIANCE WITH SUBPOENA

The attached subpoena, by Illinois law, requires you and/or your organization to appear and to produce commanded documents on August 31, 2022, at the Law Office of Alphonse A. Talarico, attorney for Plaintiff Paul Dulberg.

DEPONENT:

EDWARD X. CLINTON,
Individually and as Manager of
Clinton Law Firm, LLC
111 West Washington Street Suite 1437
Chicago, Illinois 60602-2708

Your actual appearance will be waived if the commanded documents are mailed, by certified or registered mail, or delivered to our office on or before August 26, 2022 prior to that date and you inform us so by that date.

Please sign and date this form and return it to us with your records and a copy of this subpoena .

Affidavit of Compliance

The undersigned certifies under penalties of perjury as provided by law pursuant to the Illinois Code of Civil Procedure, 735 ILCS 5/1-109, that the statements checked below are true and correct.

Check one (1) from the following:

_____ After making a diligent search of any and all the records in our possession or control, I certify that all records we have on the above are submitted herewith in response to this subpoena.

_____ After making a diligent search of any and all records, I certify there are no records to provide in response to this subpoena.

Check one (1) from the following:

_____ I am the Custodian of Records for Edward X. Clinton and Clinton Law Firm LLC, and I have personal knowledge of the record-keeping procedures of Julia Christine Williams and Williams Law LLC and the manner of creation for all records produced responsive to this subpoena.

_____ I am an employee of or manager of Edward X. Clinton and Clinton Law Firm LLC, and I have personal knowledge of the record-keeping procedures of Edward X. Clinton and Clinton Law Firm LLC and the manner of creation for all records produced responsive to this subpoena.

_____ I have no personal knowledge of the record-keeping procedures of Edward X. Clinton and Clinton Law Firm LLC and the manner of creation for all records produced responsive to this subpoena.

Check **all** that apply from the following:

_____ The records produced in response to this subpoena were kept in the course of the regularly conducted activity of Edward X. Clinton and Clinton Law Firm LLC.

_____ The records produced in response to this subpoena were made by the regularly conducted activity as a regular practice of Edward X. Clinton and Clinton Law Firm LLC.

_____ The records produced in response to this subpoena were made at or near the time of the occurrences set forth by, or from information transmitted by, a person with knowledge of the matters set forth within the records.

Date: _____, 2022

Position: _____

Name: _____

(Print)

(Signature)

