

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

PAUL DULBERG,)	
)	
Plaintiff,)	
)	
vs.)	No. 17 LA 377
)	
THE LAW OFFICES OF THOMAS J.)	
POPOVICH, P.C., and HANS MAST,)	
)	
Defendants.)	

**DEFENDANTS THE LAW OFFICES OF THOMAS J. POPOVICH, P.C.'S
INTERROGATORIES TO PLAINTIFF PAUL DULBERG**

Defendant, The Law Offices of Thomas J. Popovich, P.C., by and through its attorneys, GEORGE K. FLYNN and KARBAL, COHEN, ECONOMOU, SILK, & DUNNE, LLC, propounds the following 213(f)(1)(2) and (3) Interrogatories upon Plaintiff, Paul Dulberg, to be answered within the next twenty-eight (28) days:

INSTRUCTIONS

1. The "Complaint" refers to the matter *Paul Dulberg v. The Law Offices of Thomas J. Popovich, P.C. and Hans Mast*, Court No. 17 LA 377.
2. "You" or "your" refers to the Plaintiff, Paul Dulberg.
3. "Defendants" refer to The Law Offices of Thomas J. Popovich, P.C. and Hans Mast.
4. "Communications" mean any oral, written, or electronic transmission of information including, without limitation, meetings, discussions, conversations, telephone calls, memoranda, letters, telecopies, telexes, e-mails, conferences, seminars, messages, notes, or memoranda.

5. “Documents” refer to, without limiting the generality of its meaning, writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any medium from which information can be obtained, translated, if necessary, by you into reasonably usable form, and includes all drafts and non-identical copies.

INTERROGATORIES

1. State the name, address, telephone number and occupation of each person you will call as a witness at the time of trial of this cause and identify each witness as: (1) a **lay witness**; (2) an **independent expert witness**; or (3) a **controlled expert witness**.

ANSWER:

2. State for each **lay witness** set forth above the subjects on which the witness will testify.

ANSWER:

3. State for each **independent expert witness** set forth above:

- (a) the subject on which the witness will testify; and
- (b) the opinions you expect to elicit from the witness.

ANSWER:

4. State for each **controlled expert witness** identified by you in answer to Interrogatory No. 1:

- (a) the subject matter on which the witness will testify;
- (b) the conclusions and opinions of the witness and the bases thereof;
- (c) the qualifications of the witness; and
- (d) any reports prepared by the witness about the case.

ANSWER:

5. State the date upon which each **independent expert witness** first formed their substantive opinions.

ANSWER:

6. State with particularity your knowledge of the facts known by and opinions held by each **independent expert witness**.

ANSWER:

7. State whether or not the work of each such **independent expert witness** in this case has been completed and, if not, the nature of the work remaining to be done, what materials or documents are still being searched or awaiting receipt and the date on which such further work is expected to be completed

ANSWER:

8. State the date upon which each **controlled expert witness** first formed their substantive opinions.

ANSWER:

9. State with particularity the conclusions and opinions of each **controlled expert witness** and the basis for each such conclusion and/or opinion.

ANSWER:

10. Identify and attach each and every report and any underlying documents, notes or memoranda regarding said report prepared by each **controlled expert witness** listed and indicate whether the report is oral, written or both.

ANSWER:

11. State the name, author, publisher, page and date of publication of all texts, articles, journals, medical literature, regulations or codes upon which each **controlled expert witness** relied in reaching the opinion or opinions to which he will testify at trial.

ANSWER:

12. Identify each and every rule, regulation, code or guideline of any public authority, trade or professional association, or other standard-setting organization which each **controlled expert witness** may use or refer to at the trial of this action, giving the complete citation and description thereof.

ANSWER:

13. Set forth with particularity the qualifications of each **controlled expert witness** identified in answer to 213 f(1)(2)&(3) Interrogatory No. 1 and attach a curriculum vitae of each controlled expert witness pursuant to Supreme Court Rule 214.

ANSWER:

14. For each **controlled expert witness** identified by you in answer to 213 f(1)(2)&(3) Interrogatory No. 1, identify the name, docket number, and court for each lawsuit in which that opinion witness has given deposition and/or trial testimony within the last 5 (five) years. For each such opinion witness, please further state the name of the party on whose behalf the opinion witness testified in each such lawsuit.

ANSWER:

15. For each lawsuit identified by you in Answer to 213 f(1)(2)&(3) Interrogatory No. 14, please state whether the **controlled expert witness** who gave testimony in that case was recognized by the presiding court as being qualified to render an expert opinion and, if so, in what fields or disciplines the opinion witness was deemed qualified to testify as an expert witness.

ANSWER:

16. State whether or not the work of each such **controlled expert witness** in this case has been completed and, if not, the nature of the work remaining to be done, what materials or

documents are still being searched or awaiting receipt and the date on which such further work is expected to be completed.

ANSWER:

17. In accordance with Supreme Court Rule 213(i), You are requested to supplement or amend seasonably your Answers or Responses to these 213 f(1)(2)&(3) Interrogatories whenever new or additional information subsequently becomes known to the answering party.

ANSWER:

Respectfully submitted,

/s/ George K. Flynn

GEORGE K. FLYNN
KARBAL COHEN ECONOMOU SILK DUNNE, LLC

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