

COMPEX LEGAL SERVICES

325 Maple Avenue, Torrance, California 90503

(888) 685-4411

RECORD REQUEST FORM

Compex Order: F13657

THOMAS J. POPOVICH, P.C.
34 16 WEST ELM STREET
MCHENRY, IL 60050

December 06, 2013

RE: DULBERG V. GAGNON, ET AL.
Case No.: 12 LA 000178
Record Subject: DULBERG, PAUL
Records requested by: LAW OFFICES OF STEVEN LIHOSIT

DEAR HANS A. MAST:

Compex Legal Services has been requested by the firm named above to obtain records from the locations listed below.

If you require copies of any of these records, please indicate by checking the box next to the appropriate location(s) and sign and return the form(s) to Compex Legal Services. If no boxes are checked, we will assume you are requesting records from all locations.

Please note:

By placing a check mark in the box next to a location, you have indicated your desire to receive a copy of the records received by Compex Legal Services from that location. Should you desire a copy of any original item(s) listed below the location, please indicate by checking the box before the item description. If you check "Films" and/or "Other" which may include copies of original items such as photos, blueprints, video or audio tapes, you must place your order within (2) business days of receipt of this notice to assure proper delivery.

☐ If a location provides a Certificate of No Records, you will receive a copy UNLESS this box is checked

Records Films Other
 (If requested)

☐ ☐ ☐ A. ALEXIAN BROTHERS NEUROSCIENCES INSTITUTE

If your firm has an account with Compex Legal Services, normal billing will apply. If you represent an insurance carrier and prefer that we bill them directly, please provide the following information:

Carrier _____ Adjuster _____
Address _____ Phone _____
City, St _____ Zip _____
Claim _____ Insured _____

Your signature below confirms that you are ordering these records and agree to the terms and conditions(attached)

Authorized signature _____ (Required) Date _____

Please return all pages of this form with your signature to FAX (800)479-3365

IN THE CIRCUIT COURT OF THE TWENTYSECOND JUDICIAL CIRCUIT, MCHENRY COUNTY, ILLINOIS

DULBERG

Plaintiff/Petitioner

v.

No. 12 LA 000178

GAGNON, ET AL.

Defendant/Respondent

SUBPOENA IN A CIVIL MATTER
(For Testimony and/or Documents)

To: ALEXIAN BROTHERS NEUROSCIENCES INSTITUTE
800 BIESTERFIELD ROAD, EBERLE BLDG., SUITE 610
ELK GROVE VILLAGE, IL 60007

- ☐ 1. YOU ARE COMMANDED to appear to give your testimony before the Honorable _____
in Room _____, Illinois on _____,
at _____ m.
- ☐ 2. YOU ARE COMMANDED to appear and give your deposition testimony before a Notary Public at:
in Room _____, Illinois on _____,
at _____ m.
- ☒ 3. YOU ARE COMMANDED to mail the following documents in your possession or control to COMPLEX LEGAL SERVICES, INC.
at 1016 WEST JACKSON BOULEVARD, SUITE 213, CHICAGO, IL 60607, on or before DECEMBER 24, 2013
at 10:00 a.m.
(THIS IS FOR RECORDS ONLY. THERE WILL BE NO ORAL INTERROGATORIES.):

☒ Description continued on attached page(s).

YOUR FAILURE TO RESPOND TO THIS SUBPOENA WILL SUBJECT YOU TO PUNISHMENT FOR CONTEMPT OF THIS COURT.

Notice to Deponent:

- ☒ 1. The deponent is a public or private corporation, partnership, association, or governmental agency. The matter(s) on which examination is requested are as follows: TO OBTAIN FACTUAL INFORMATION RELATING TO THE NATURE AND EXTENT OF INJURIES AND/OR DAMAGES ALLEGED BY THE PARTIES IN THIS LAWSUIT AND NO OTHER MEANS OF PRODUCTION ARE AVAILABLE.

☐ Description continued on attached page(s).

(A nonparty organization has a duty to designate one or more officers, directors, or managing agents, or other persons to testify on its behalf, and may set forth, for each person designated, the matters on which that person will testify. Ill. Sup. Ct. Rule 206.)

- ☐ 2. The deponent's testimony will be recorded by use of an audio-visual recording device, operated by _____
(Name of Recording Device Operator)
3. No discovery deposition of any party or witnesses shall exceed three hours regardless of the number of parties involved in the case, except by stipulation of the parties or by order upon showing that good cause warrants a lengthier examination. Ill. Sup. Ct. Rule 206(d).

Atty. No. _____

Pro Se 99500

Name: PERRY A. ACCARDO

Issued by: [S] PERRY A. ACCARDO

Signature

Atty. for: GAGNON

☒ Attorney

Address: 200 NORTH LASALLE STREET, SUITE 2550

☐ Clerk of Court

City/State/Zip: CHICAGO, IL 60601

Telephone: 312-558-9800

Date: DECEMBER 06, 2013

- ☐ I served this subpoena by mailing a copy, as required by Ill. Sup. Ct. Rules 11, 12 and 204(a)(2), to _____
by certified mail, return receipt requested (Receipt # _____) on _____.
I paid the witness \$ _____ for witness and mileage fees.
- ☐ I served this subpoena by handing a copy to _____ on _____.
I paid the witness \$ _____ for witness and mileage fees.

(Signature of Server)

(Print Name)

ATTACHMENT 3

F13657-A

SUBJECT: DULBERG, PAUL

AKA: NOT PROVIDED

DOB: 03/19/1970

SSN: 323-76-4001

ALL DOCUMENTS AND RECORDS, INCLUDING, BUT NOT LIMITED TO, CD ROM, TAPE DRIVE, FLOPPY DRIVE, HARD DRIVE, SCANNED DOCUMENTS, EMAIL CORRESPONDENCE AND ALL OTHER DOCUMENTS STORED ELECTRONICALLY OR DIGITALLY, INCLUDING ALL OFFICE, EMERGENCY ROOM, INPATIENT AND OUTPATIENT CHARTS AND RECORDS, SOAP NOTES, PHYSICAL THERAPY RECORDS, INCLUDING SIGN-IN SHEETS, COPIES OF ALL PRINTED MATERIAL DESCRIBING EXERCISES PRESCRIBED AND DOCUMENTATION WHICH INDICATES DATES AND TIMES OF PATIENT'S APPOINTMENTS, PHOTOGRAPHS, INSURANCE DOCUMENTS, ALL BILLING RECORDS, INCLUDING, BUT NOT LIMITED TO, ANY INSURANCE BILLING OR PAYMENT INFORMATION, PROCEDURE CODES/CPT CODES, ITEMIZED STATEMENTS OF CHARGES, PAYMENT AND WRITE-OFF RECORDS AND PAYMENT TRANSACTIONS, FROM ALL SOURCES, AND ALL PAYMENT HISTORY, TO INCLUDE ANY COMPUTER GENERATED BILLING AND PAYMENT SOFTWARE THAT CONTAINS SAID INFORMATION, PERTAINING TO THE CARE, TREATMENT AND EXAMINATION OF THE PATIENT, REGARDLESS OF TREATMENT DATE.

ATTORNEY OR PARTY WITHOUT ATTORNEY:		TELEPHONE NO	FOR COURT USE ONLY
PERRY A. ACCARDO LAW OFFICES OF STEVEN LIHOSIT 200 NORTH LASALLE STREET, SUITE 2550, CHICAGO, IL 60601		(312) 558-9800	
ATTORNEY FOR: GAGNON			
NAME OF COURT: CIRCUIT COURT FOR THE STATE OF ILLINOIS POST OFFICE & FOR THE COUNTY OF MCHENRY STREET ADDRESS 2200 NORTH SEMINARY AVENUE, WOODSTOCK, IL 60098			
PLAIN-TIFF PETITIONER: DULBERG DEFENDANT-RESPONDENT: GAGNON, ET AL. CASE NUMBER: 12 LA 000178			
NOTICE OF DEPOSITION			

NOTICE TO ALL PARTIES AND THEIR ATTORNEY(S):

1. The production of documents by the Custodian of Records of the following business will be required as follows:

ALEXIAN BROTHERS NEUROSCIENCES INSTITUTE

800 BIESTERFIELD ROAD, EBERLE BLDG., SUITE 610, ELK GROVE VILLAGE, IL 60007 12/24/2013

DATE

TIME

10:00 AM

Date: December 06, 2013

PERRY A. ACCARDO

(Type or Print Name)

[S] PERRY A. ACCARDO

(Signature)

ATTORNEY AT LAW

(Title)

NOTICE OF DEPOSITION

I am employed in LOS ANGELES County, California. I am over the age of 18 and not a party to the within action; my business address is: 1016 WEST JACKSON BOULEVARD, SUITE 213, CHICAGO, IL 60607


On 12/10/13, I gave notice to: SEE SERVICE LIST BELOW

On the above date, I served true copies of the following documents;
Subpoena

To each party appearing in this action, at the address below, by placing true copies thereof enclosed in a sealed envelope with postage fully pre-paid, in the United States mail at 325 MAPLE AVENUE,
TORRANCE, CA 90503

I declare under penalty of perjury under the laws of the State of Illinois that the foregoing is true and correct, and that this declaration was executed on 12/10/13.

SIGNED: _____



Sharon Prytz

THOMAS J. POPOVICH, P.C.
HANS A. MAST
3416 WEST ELM STREET
MCHENRY, IL 60050

CICERO, FRANCE, BARCH & ALEXANDER, P.C.
CICERO, FRANCE, BARCH & AL
6323 EAST RIVERSIDE BOULEVARD
ROCKFORD, IL 61114

COMPEX LEGAL SERVICES

325 Maple Avenue, Torrance, California 90503

(888) 685-4411

RECORD REQUEST FORM

Compex Order: E39572

THOMAS J. POPOVICH, P.C.
34 16 W. ELM ST
MC HENRY, IL 60050

October 29, 2012

RE: DULBERG V. GAGNON, ET AL.
Case No.: 12LA000178
Record Subject: DULBERG, PAUL
Records requested by: LAW OFFICE OF M. GERARD GREGOIRE

DEAR HANS A. MAST:

Compex Legal Services has been requested by the firm named above to obtain records from the locations listed below.

If you require copies of any of these records, please indicate by checking the box next to the appropriate location(s) and sign and return the form(s) to Compex Legal Services. If no boxes are checked, we will assume you are requesting records from all locations.

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☐ If a location provides a Certificate of No Records, you will receive a copy UNLESS this box is checked

Records Films Other
 (If requested)

☐ ☐ ☐ A . ASSOCIATES NEUROLOGY

If your firm has an account with Compex Legal Services, normal billing will apply. If you represent an insurance carrier and prefer that we bill them directly, please provide the following information:

Carrier _____ Adjuster _____
Address _____ Phone _____
City, St _____ Zip _____
Claim _____ Insured _____

Your signature below confirms that you are ordering these records and agree to the terms and conditions(attached)

Authorized signature _____ Date _____
(Required)

Print Name _____ Title _____

E-mail _____ Phone _____ Fax _____

Please return all pages of this form with your signature to FAX (800)479-3365

IN THE CIRCUIT COURT OF THE TWENTYSECOND JUDICIAL CIRCUIT, MCHENRY COUNTY, ILLINOIS

DULBERG

Plaintiff/Petitioner

v.

No. 12LA000178

GAGNON, ET AL.

Defendant/Respondent

SUBPOENA IN A CIVIL MATTER
(For Testimony and/or Documents)

To: ASSOCIATES NEUROLOGY

1900 HOLLISTER DRIVE, SUITE 250

LIBERTYVILLE, IL 60048

- ☐ 1. YOU ARE COMMANDED to appear to give your testimony before the Honorable _____
in Room _____, Illinois on _____,
at _____ m.
- ☐ 2. YOU ARE COMMANDED to appear and give your deposition testimony before a Notary Public at: _____
in Room _____, Illinois on _____,
at _____ m.
- ☒ 3. YOU ARE COMMANDED to mail the following documents in your possession or control to COMPLEX LEGAL SERVICES, INC.
at 1016 WEST JACKSON BOULEVARD, SUITE 213, CHICAGO, IL 60607, on or before NOVEMBER 15, 2012
at 10:00 a.m.
(THIS IS FOR RECORDS ONLY. THERE WILL BE NO ORAL INTERROGATORIES.):

☒ Description continued on attached page(s).YOUR FAILURE TO RESPOND TO THIS SUBPOENA WILL SUBJECT YOU TO PUNISHMENT FOR CONTEMPT OF THIS COURT.
Notice to Deponent:

- ☒ 1. The deponent is a public or private corporation, partnership, association, or governmental agency. The matter(s) on which examination is requested are as follows: TO OBTAIN FACTUAL INFORMATION RELATING TO THE NATURE AND EXTENT OF INJURIES AND/OR DAMAGES ALLEGED BY THE PARTIES IN THIS LAWSUIT AND NO OTHER MEANS OF PRODUCTION ARE AVAILABLE.

☐ Description continued on attached page(s).

(A nonparty organization has a duty to designate one or more officers, directors, or managing agents, or other persons to testify on its behalf, and may set forth, for each person designated, the matters on which that person will testify. Ill. Sup. Ct. Rule 206.)

- ☐ 2. The deponent's testimony will be recorded by use of an audio-visual recording device, operated by _____
(Name of Recording Device Operator)
3. No discovery deposition of any party or witnesses shall exceed three hours regardless of the number of parties involved in the case, except by stipulation of the parties or by order upon showing that good cause warrants a lengthier examination. Ill. Sup. Ct. Rule 206(d).

Atty. No. _____

Pro Se 99500

Name: PERRY A. ACCARDO

Issued by: [S] PERRY A. ACCARDO

Signature

Atty. for: GAGNON

☒ Attorney☐ Clerk of Court

Address: 200 NORTH LASALLE STREET, SUITE 2650

City/State/Zip: CHICAGO, IL 60601

Telephone: 312-558-9800

Date: OCTOBER 29, 2012

- ☐ I served this subpoena by mailing a copy, as required by Ill. Sup. Ct. Rules 11, 12 and 204(a)(2), to _____
by certified mail, return receipt requested (Receipt # _____) on _____
I paid the witness \$ _____ for witness and mileage fees.
- ☐ I served this subpoena by handing a copy to _____ on _____
I paid the witness \$ _____ for witness and mileage fees.

(Signature of Server)

(Print Name)

ATTACHMENT 3

E39572-A

SUBJECT: DULBERG, PAUL

AKA: NOT PROVIDED

DOB: 03/19/1970

SSN: 323-76-4001

ALL DOCUMENTS AND RECORDS, INCLUDING, BUT NOT LIMITED TO, CD ROM, TAPE DRIVE, FLOPPY DRIVE, HARD DRIVE, SCANNED DOCUMENTS, EMAIL CORRESPONDENCE AND ALL OTHER DOCUMENTS STORED ELECTRONICALLY OR DIGITALLY, INCLUDING ALL OFFICE, EMERGENCY ROOM, INPATIENT AND OUTPATIENT CHARTS AND RECORDS, PHYSICAL THERAPY RECORDS, INCLUDING SIGN-IN SHEETS, COPIES OF ALL PRINTED MATERIAL DESCRIBING EXERCISES PRESCRIBED AND DOCUMENTATION WHICH INDICATES DATES AND TIMES OF PATIENT'S APPOINTMENTS, PHOTOGRAPHS, INSURANCE DOCUMENTS, ALL BILLING RECORDS, INCLUDING, BUT NOT LIMITED TO, ANY INSURANCE BILLING OR PAYMENT INFORMATION, ITEMIZED STATEMENTS OF CHARGES, PAYMENT AND WRITE-OFF RECORDS AND PAYMENT TRANSACTIONS, FROM ALL SOURCES, AND ALL PAYMENT HISTORY, PERTAINING TO THE CARE, TREATMENT AND EXAMINATION OF THE PATIENT, REGARDLESS OF TREATMENT DATE.

ATTORNEY OR PARTY WITHOUT ATTORNEY:		TELEPHONE NO	FOR COURT USE ONLY
PERRY A. ACCARDO LAW OFFICE OF M. GERARD GREGOIRE 200 NORTH LASALLE STREET, SUITE 2650, CHICAGO, IL 60601		(312) 558-9800	
ATTORNEY FOR: GAGNON			
NAME OF COURT: CIRCUIT COURT FOR THE STATE OF ILLINOIS POST OFFICE & FOR THE COUNTY OF MCHENRY STREET ADDRESS 2200 NORTH SEMINARY AVENUE, WOODSTOCK, IL 60098			
PLAINTIFF/PETITIONER: DULBERG DEFENDANT/RESPONDENT: GAGNON, ET AL. CASE NUMBER: 12LA000178			
NOTICE OF DEPOSITION			

NOTICE TO ALL PARTIES AND THEIR ATTORNEY(S):

1. The production of documents by the Custodian of Records of the following business will be required as follows:

ASSOCIATES NEUROLOGY

1900 HOLLISTER DRIVE, SUITE 250, LIBERTYVILLE, IL 60048

DATE

TIME

11/15/2012

10:00 AM

Date: October 29, 2012

PERRY A. ACCARDO

(Type or Print Name)

[S] PERRY A. ACCARDO

(Signature)

ATTORNEY AT LAW

(Title)

NOTICE OF DEPOSITION

IN THE CIRCUIT COURT OF THE TWENTYSECOND JUDICIAL CIRCUIT, MCHENRY COUNTY, ILLINOIS

DULBERG

Plaintiff/Petitioner

v.

No. 12LA000178

GAGNON, ET AL.

Defendant/Respondent

SUBPOENA IN A CIVIL MATTER
(For Testimony and/or Documents)

To: MCHENRY RADIOLOGISTS

P.O. BOX 220

MCHENRY, IL 60051

- ☐ 1. YOU ARE COMMANDED to appear to give your testimony before the Honorable _____
in Room _____, Illinois on _____,
at _____ m.
- ☐ 2. YOU ARE COMMANDED to appear and give your deposition testimony before a Notary Public at: _____
in Room _____, Illinois on _____,
at _____ m.
- ☒ 3. YOU ARE COMMANDED to mail the following documents in your possession or control to COMPLEX LEGAL SERVICES, INC.
at 1016 WEST JACKSON BOULEVARD, SUITE 213, CHICAGO, IL 60607, on or before NOVEMBER 15, 2012,
at 10:15 a.m.
(THIS IS FOR RECORDS ONLY. THERE WILL BE NO ORAL INTERROGATORIES.):

☒ Description continued on attached page(s).YOUR FAILURE TO RESPOND TO THIS SUBPOENA WILL SUBJECT YOU TO PUNISHMENT FOR CONTEMPT OF THIS COURT.
Notice to Deponent:

- ☒ 1. The deponent is a public or private corporation, partnership, association, or governmental agency. The matter(s) on which examination is requested are as follows: TO OBTAIN FACTUAL INFORMATION RELATING TO THE NATURE AND EXTENT OF INJURIES AND/OR DAMAGES ALLEGED BY THE PARTIES IN THIS LAWSUIT AND NO OTHER MEANS OF PRODUCTION ARE AVAILABLE.

☐ Description continued on attached page(s).

(A nonparty organization has a duty to designate one or more officers, directors, or managing agents, or other persons to testify on its behalf, and may set forth, for each person designated, the matters on which that person will testify. Ill. Sup. Ct. Rule 206.)

- ☐ 2. The deponent's testimony will be recorded by use of an audio-visual recording device, operated by _____
(Name of Recording Device Operator)
3. No discovery deposition of any party or witnesses shall exceed three hours regardless of the number of parties involved in the case, except by stipulation of the parties or by order upon showing that good cause warrants a lengthier examination. Ill. Sup. Ct. Rule 206(d).

Atty. No. _____

Pro Se 99500

Name: PERRY A. ACCARDO

Issued by: [S] PERRY A. ACCARDO

Signature

Atty. for: GAGNON

☒ Attorney

Address: 200 NORTH LASALLE STREET, SUITE 2650

☐ Clerk of Court

City/State/Zip: CHICAGO, IL 60601

Telephone: 312-558-9800

Date: OCTOBER 29, 2012

- ☐ I served this subpoena by mailing a copy, as required by Ill. Sup. Ct. Rules 11, 12 and 204(a)(2), to _____
by certified mail, return receipt requested (Receipt # _____) on _____,
I paid the witness \$ _____ for witness and mileage fees.
- ☐ I served this subpoena by handing a copy to _____ on _____,
I paid the witness \$ _____ for witness and mileage fees.

(Signature of Server)

(Print Name)

ATTACHMENT 3

E39572-B

SUBJECT: DULBERG, PAUL

AKA: NOT PROVIDED

DOB: 03/19/1970

SSN: 323-76-4001

ALL DOCUMENTS AND RECORDS, INCLUDING, BUT NOT LIMITED TO, CD ROM, TAPE DRIVE, FLOPPY DRIVE, HARD DRIVE, SCANNED DOCUMENTS, EMAIL CORRESPONDENCE AND ALL OTHER DOCUMENTS STORED ELECTRONICALLY OR DIGITALLY, INCLUDING ALL OFFICE, EMERGENCY ROOM, INPATIENT AND OUTPATIENT CHARTS AND RECORDS, PHYSICAL THERAPY RECORDS, INCLUDING SIGN-IN SHEETS, COPIES OF ALL PRINTED MATERIAL DESCRIBING EXERCISES PRESCRIBED AND DOCUMENTATION WHICH INDICATES DATES AND TIMES OF PATIENT'S APPOINTMENTS, PHOTOGRAPHS, INSURANCE DOCUMENTS, ALL BILLING RECORDS, INCLUDING, BUT NOT LIMITED TO, ANY INSURANCE BILLING OR PAYMENT INFORMATION, ITEMIZED STATEMENTS OF CHARGES, PAYMENT AND WRITE-OFF RECORDS AND PAYMENT TRANSACTIONS, FROM ALL SOURCES, AND ALL PAYMENT HISTORY, PERTAINING TO THE CARE, TREATMENT AND EXAMINATION OF THE PATIENT, REGARDLESS OF TREATMENT DATE.

ATTORNEY OR PARTY WITHOUT ATTORNEY:		TELEPHONE NO	FOR COURT USE ONLY
PERRY A. ACCARDO LAW OFFICE OF M. GERARD GREGOIRE 200 NORTH LASALLE STREET, SUITE 2650, CHICAGO, IL 60601		(312) 558-9800	
ATTORNEY FOR: GAGNON			
NAME OF COURT: CIRCUIT COURT FOR THE STATE OF ILLINOIS POST OFFICE & FOR THE COUNTY OF MCHENRY STREET ADDRESS 2200 NORTH SEMINARY AVENUE, WOODSTOCK, IL 60098			
PLAINTIFF/PETITIONER: DULBERG DEFENDANT/RESPONDENT: GAGNON, ET AL. CASE NUMBER: 12LA000178			
NOTICE OF DEPOSITION			

NOTICE TO ALL PARTIES AND THEIR ATTORNEY(S):

1. The production of documents by the Custodian of Records of the following business will be required as follows:

M CHENRY RADIOLOGISTS
P.O. BOX 220, MCHENRY, IL 60051

DATE

TIME

11/15/2012

10:15 AM

Date: October 29, 2012

PERRY A. ACCARDO

(Type or Print Name)

[S] PERRY A. ACCARDO

(Signature)

ATTORNEY AT LAW

(Title)

NOTICE OF DEPOSITION

IN THE CIRCUIT COURT OF THE TWENTYSECOND JUDICIAL CIRCUIT, MCHENRY COUNTY, ILLINOIS

DULBERG

Plaintiff/Petitioner

v.

No. 12LA000178

GAGNON, ET AL.

Defendant/Respondent

SUBPOENA IN A CIVIL MATTER
(For Testimony and/or Documents)

To: MORAINER PHYSICIANS

P.O. BOX 8759

PHILADELPHIA, PA 19101

- ☐ 1. YOU ARE COMMANDED to appear to give your testimony before the Honorable _____
in Room _____, Illinois on _____,
at _____ m.
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at _____ m.
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at 10:30 a.m.
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Atty. No. _____

Pro Se 99500

Name: PERRY A. ACCARDO

Issued by: [S] PERRY A. ACCARDO

Signature

Atty. For: GAGNON

☒ Attorney

Address: 200 NORTH LASALLE STREET, SUITE 2650

☐ Clerk of Court

City/State/Zip: CHICAGO, IL 60601

Telephone: 312-558-9800

Date: OCTOBER 29, 2012

- ☐ I served this subpoena by mailing a copy, as required by Ill. Sup. Ct. Rules 11, 12 and 204(a)(2), to _____
by certified mail, return receipt requested (Receipt # _____) on _____
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(Signature of Server)

(Print Name)

ATTACHMENT 3

E39572-C

SUBJECT: DULBERG, PAUL

A KA: NOT PROVIDED

DOB: 03/19/1970

SSN: 323-76-4001

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ATTORNEY FOR: GAGNON			
NAME OF COURT: CIRCUIT COURT FOR THE STATE OF ILLINOIS POST OFFICE & FOR THE COUNTY OF MCHENRY STREET ADDRESS 2200 NORTH SEMINARY AVENUE, WOODSTOCK, IL 60098			
PLAINTIFF/PETITIONER: DULBERG DEFENDANT/RESPONDENT: GAGNON, ET AL. CASE NUMBER: 12LA000178			
NOTICE OF DEPOSITION			

NOTICE TO ALL PARTIES AND THEIR ATTORNEY(S):

1. The production of documents by the Custodian of Records of the following business will be required as follows:

MORaine ER PHYSICIANS
P.O. BOX 8759, PHILADELPHIA, PA 19101

DATE	TIME
11/15/2012	10:30 AM

Date: October 29, 2012

PERRY A. ACCARDO

(Type or Print Name)

[S] PERRY A. ACCARDO

(Signature)

ATTORNEY AT LAW

(Title)

NOTICE OF DEPOSITION

IN THE CIRCUIT COURT OF THE TWENTYSECOND JUDICIAL CIRCUIT, MCHENRY COUNTY, ILLINOIS

DUJLBERG

Plaintiff/Petitioner

v.

No. 12LA000178

GAGNON, ET AL.

Defendant/Respondent

SUBPOENA IN A CIVIL MATTER
(For Testimony and/or Documents)

To: CENTEGRA NORTHERN ILLINOIS MEDICAL CENTER
4201 MEDICAL CENTER DRIVE
MCHENRY, IL 60050

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at _____ m.
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at 08:30 a m.
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- ☒ 1. The deponent is a public or private corporation, partnership, association, or governmental agency. The matter(s) on which examination is requested are as follows: TO OBTAIN FACTUAL INFORMATION RELATING TO THE NATURE AND EXTENT OF INJURIES AND/OR DAMAGES ALLEGED BY THE PARTIES IN THIS LAWSUIT AND NO OTHER MEANS OF PRODUCTION ARE AVAILABLE.

☐ Description continued on attached page(s).

(A nonparty organization has a duty to designate one or more officers, directors, or managing agents, or other persons to testify on its behalf, and may set forth, for each person designated, the matters on which that person will testify. Ill. Sup. Ct. Rule 206.)

- ☐ 2. The deponent's testimony will be recorded by use of an audio-visual recording device, operated by _____
(Name of Recording Device Operator)
3. No discovery deposition of any party or witnesses shall exceed three hours regardless of the number of parties involved in the case, except by stipulation of the parties or by order upon showing that good cause warrants a lengthier examination. Ill. Sup. Ct. Rule 206(d).

Atty. No. _____

Pro Se 99500

Name: PERRY A. ACCARDO

Issued by: [S] PERRY A. ACCARDO

Signature

Atty. for: GAGNON

☒ Attorney☐ Clerk of Court

Address: 200 NORTH LASALLE STREET, SUITE 2650

City/State/Zip: CHICAGO, IL 60601

Telephone: 312-558-9800

Date: OCTOBER 29, 2012

- ☐ I served this subpoena by mailing a copy, as required by Ill. Sup. Ct. Rules 11, 12 and 204(a)(2), to _____
by certified mail, return receipt requested (Receipt # _____) on _____
I paid the witness \$ _____ for witness and mileage fees.
- ☐ I served this subpoena by handing a copy to _____ on _____
I paid the witness \$ _____ for witness and mileage fees.

(Signature of Server)

(Print Name)

ATTACHMENT 3

E39572-D

SUBJECT: DULBERG, PAUL

AKA: NOT PROVIDED

DOB: 03/19/1970

SSN: 323-76-4001

ALL DOCUMENTS AND RECORDS, INCLUDING, BUT NOT LIMITED TO, CD ROM, TAPE DRIVE, FLOPPY DRIVE, HARD DRIVE, SCANNED DOCUMENTS, EMAIL CORRESPONDENCE AND ALL OTHER DOCUMENTS STORED ELECTRONICALLY OR DIGITALLY, INCLUDING ALL OFFICE, EMERGENCY ROOM, INPATIENT AND OUTPATIENT CHARTS AND RECORDS, PHYSICAL THERAPY RECORDS, INCLUDING SIGN-IN SHEETS, COPIES OF ALL PRINTED MATERIAL DESCRIBING EXERCISES PRESCRIBED AND DOCUMENTATION WHICH INDICATES DATES AND TIMES OF PATIENT'S APPOINTMENTS, PHOTOGRAPHS, INSURANCE DOCUMENTS, ALL BILLING RECORDS, INCLUDING, BUT NOT LIMITED TO, ANY INSURANCE BILLING OR PAYMENT INFORMATION, ITEMIZED STATEMENTS OF CHARGES, PAYMENT AND WRITE-OFF RECORDS AND PAYMENT TRANSACTIONS, FROM ALL SOURCES, AND ALL PAYMENT HISTORY, PERTAINING TO THE CARE, TREATMENT AND EXAMINATION OF THE PATIENT, REGARDLESS OF TREATMENT DATE.

ATTORNEY OR PARTY WITHOUT ATTORNEY:		TELEPHONE NO	FOR COURT USE ONLY
PERRY A. ACCARDO LAW OFFICE OF M. GERARD GREGOIRE 200 NORTH LASALLE STREET, SUITE 2650, CHICAGO, IL 60601		(312) 558-9800	
ATTORNEY FOR: GAGNON			
NAME OF COURT: CIRCUIT COURT FOR THE STATE OF ILLINOIS POST OFFICE & FOR THE COUNTY OF MCHENRY STREET ADDRESS 2200 NORTH SEMINARY AVENUE, WOODSTOCK, IL 60098			
PLAINTIFF/PETITIONER: DULBERG DEFENDANT/RESPONDENT: GAGNON, ET AL. CASE NUMBER: 12LA000178			
NOTICE OF DEPOSITION			

NOTICE TO ALL PARTIES AND THEIR ATTORNEY(S):

1. The production of documents by the Custodian of Records of the following business will be required as follows:

CENTEGRA NORTHERN ILLINOIS MEDICAL CENTER
4201 MEDICAL CENTER DRIVE, MCHENRY, IL 60050

DATE

TIME

11/15/2012

08:30 AM

Date: October 29, 2012

PERRY A. ACCARDO

(Type or Print Name)

[S] PERRY A. ACCARDO

(Signature)

ATTORNEY AT LAW

(Title)

NOTICE OF DEPOSITION

IN THE CIRCUIT COURT OF THE TWENTYSECOND JUDICIAL CIRCUIT, MCHENRY COUNTY, ILLINOIS

DULBERG

Plaintiff/Petitioner

v.

No. 12LA000178

GAGNON, ET AL.

Defendant/Respondent

SUBPOENA IN A CIVIL MATTER
(For Testimony and/or Documents)

To: OPEN ADVANCED MRI

720 EAST ROLLINS ROAD

ROUND LAKE BEACH, IL 60073

- ☐ 1. YOU ARE COMMANDED to appear to give your testimony before the Honorable _____
in Room _____, Illinois on _____,
at _____ m.
- ☐ 2. YOU ARE COMMANDED to appear and give your deposition testimony before a Notary Public at:
in Room _____, Illinois on _____,
at _____ m.
- ☒ 3. YOU ARE COMMANDED to mail the following documents in your possession or control to COMPLEX LEGAL SERVICES, INC.
at 1016 WEST JACKSON BOULEVARD, SUITE 213, CHICAGO, IL 60607, on or before NOVEMBER 15, 2012
at 08:45 a m.
(THIS IS FOR RECORDS ONLY. THERE WILL BE NO ORAL INTERROGATORIES.);

☒ Description continued on attached page(s).YOU FAILURE TO RESPOND TO THIS SUBPOENA WILL SUBJECT YOU TO PUNISHMENT FOR CONTEMPT OF THIS COURT.
Notice to Deponent:

- ☒ 1. The deponent is a public or private corporation, partnership, association, or governmental agency. The matter(s) on which examination is requested are as follows: TO OBTAIN FACTUAL INFORMATION RELATING TO THE NATURE AND EXTENT OF INJURIES AND/OR DAMAGES ALLEGED BY THE PARTIES IN THIS LAWSUIT AND NO OTHER MEANS OF PRODUCTION ARE AVAILABLE.

☐ Description continued on attached page(s).

(A nonparty organization has a duty to designate one or more officers, directors, or managing agents, or other persons to testify on its behalf, and may set forth, for each person designated, the matters on which that person will testify. Ill. Sup. Ct. Rule 206.)

- ☐ 2. The deponent's testimony will be recorded by use of an audio-visual recording device, operated by _____
(Name of Recording Device Operator)
3. No discovery deposition of any party or witnesses shall exceed three hours regardless of the number of parties involved in the case, except by stipulation of the parties or by order upon showing that good cause warrants a lengthier examination. Ill. Sup. Ct. Rule 206(d).

Atty. No. _____

Pro Se 99500

Name: PERRY A. ACCARDO

Issued by: [S] PERRY A. ACCARDO

Signature

Atty. for: GAGNON

☒ Attorney

Address: 200 NORTH LASALLE STREET, SUITE 2650

☐ Clerk of Court

City/State/Zip: CHICAGO, IL 60601

Telephone: 312-558-9800

Date: OCTOBER 29, 2012

- ☐ I served this subpoena by mailing a copy, as required by Ill. Sup. Ct. Rules 11, 12 and 204(a)(2), to _____
by certified mail, return receipt requested (Receipt # _____) on _____
I paid the witness \$ _____ for witness and mileage fees.
- ☐ I served this subpoena by handing a copy to _____ on _____
I paid the witness \$ _____ for witness and mileage fees.

(Signature of Server)

(Print Name)

ATTACHMENT 3

E39572-E

SUBJECT: DULBERG, PAUL

AKA: NOT PROVIDED

DOB: 03/19/1970

SSN: 323-76-4001

ALL DOCUMENTS AND RECORDS, INCLUDING, BUT NOT LIMITED TO, CD ROM, TAPE DRIVE, FLOPPY DRIVE, HARD DRIVE, SCANNED DOCUMENTS, EMAIL CORRESPONDENCE AND ALL OTHER DOCUMENTS STORED ELECTRONICALLY OR DIGITALLY, INCLUDING ALL OFFICE, EMERGENCY ROOM, INPATIENT AND OUTPATIENT CHARTS AND RECORDS, PHYSICAL THERAPY RECORDS, INCLUDING SIGN-IN SHEETS, COPIES OF ALL PRINTED MATERIAL DESCRIBING EXERCISES PRESCRIBED AND DOCUMENTATION WHICH INDICATES DATES AND TIMES OF PATIENT'S APPOINTMENTS, PHOTOGRAPHS, INSURANCE DOCUMENTS, ALL BILLING RECORDS, INCLUDING, BUT NOT LIMITED TO, ANY INSURANCE BILLING OR PAYMENT INFORMATION, ITEMIZED STATEMENTS OF CHARGES, PAYMENT AND WRITE-OFF RECORDS AND PAYMENT TRANSACTIONS, FROM ALL SOURCES, AND ALL PAYMENT HISTORY, PERTAINING TO THE CARE, TREATMENT AND EXAMINATION OF THE PATIENT, REGARDLESS OF TREATMENT DATE.

ATTORNEY OR PARTY WITHOUT ATTORNEY:		TELEPHONE NO	FOR COURT USE ONLY
PERRY A. ACCARDO LAW OFFICE OF M. GERARD GREGOIRE 200 NORTH LASALLE STREET, SUITE 2650, CHICAGO, IL 60601		(312) 558-9800	
ATTORNEY FOR: GAGNON			
NAME OF COURT: CIRCUIT COURT FOR THE STATE OF ILLINOIS POST OFFICE & FOR THE COUNTY OF MCHENRY STREET ADDRESS 2200 NORTH SEMINARY AVENUE, WOODSTOCK, IL 60098			
PLAINTIFF/PETITIONER: DULBERG DEFENDANT/RESPONDENT: GAGNON, ET AL. CASE NUMBER: 12LA000178			
NOTICE OF DEPOSITION			

NOTICE TO ALL PARTIES AND THEIR ATTORNEY(S):

1. The production of documents by the Custodian of Records of the following business will be required as follows:

OPEN ADVANCED MRI

720 EAST ROLLINS ROAD, ROUND LAKE BEACH, IL 60073

DATE

TIME

11/15/2012

08:45 AM

Date: October 29, 2012

PERRY A. ACCARDO

(Type or Print Name)

[S] PERRY A. ACCARDO

(Signature)

ATTORNEY AT LAW

(Title)

NOTICE OF DEPOSITION

IN THE CIRCUIT COURT OF THE TWENTYSECOND JUDICIAL CIRCUIT, MCHENRY COUNTY, ILLINOIS

DULBERG

Plaintiff/Petitioner

v.

No. 12LA000178

GAGNON, ET AL.

Defendant/Respondent

SUBPOENA IN A CIVIL MATTER
(For Testimony and/or Documents)

To: MIDAMERICA HAND TO SHOULDER
1419 PETERSON ROAD
LIBERTYVILLE, IL 60048

- ☐ 1. YOU ARE COMMANDED to appear to give your testimony before the Honorable _____
in Room _____, Illinois on _____,
at _____ m.
- ☐ 2. YOU ARE COMMANDED to appear and give your deposition testimony before a Notary Public at: _____
in Room _____, Illinois on _____,
at _____ m.
- ☒ 3. YOU ARE COMMANDED to mail the following documents in your possession or control to COMPLEX LEGAL SERVICES, INC.
at 1016 WEST JACKSON BOULEVARD, SUITE 213, CHICAGO, IL 60607, on or before NOVEMBER 15, 2012,
at 09:00 a m.
(THIS IS FOR RECORDS ONLY. THERE WILL BE NO ORAL INTERROGATORIES.):

☒ Description continued on attached page(s).

YOUR FAILURE TO RESPOND TO THIS SUBPOENA WILL SUBJECT YOU TO PUNISHMENT FOR CONTEMPT OF THIS COURT.

Notice to Deponent:

- ☒ 1. The deponent is a public or private corporation, partnership, association, or governmental agency. The matter(s) on which examination is requested are as follows: TO OBTAIN FACTUAL INFORMATION RELATING TO THE NATURE AND EXTENT OF INJURIES AND/OR DAMAGES ALLEGED BY THE PARTIES IN THIS LAWSUIT AND NO OTHER MEANS OF PRODUCTION ARE AVAILABLE.

☐ Description continued on attached page(s).

(A nonparty organization has a duty to designate one or more officers, directors, or managing agents, or other persons to testify on its behalf, and may set forth, for each person designated, the matters on which that person will testify. Ill. Sup. Ct. Rule 206.)

- ☐ 2. The deponent's testimony will be recorded by use of an audio-visual recording device, operated by _____
(Name of Recording Device Operator)
3. No discovery deposition of any party or witnesses shall exceed three hours regardless of the number of parties involved in the case, except by stipulation of the parties or by order upon showing that good cause warrants a lengthier examination. Ill. Sup. Ct. Rule 206(d).

Atty. - No. _____

Pro Se 99500

Name: PERRY A. ACCARDO

Issued by: [S] PERRY A. ACCARDO

Signature

Atty. for: GAGNON

☒ Attorney

Address: 200 NORTH LASALLE STREET, SUITE 2650

☐ Clerk of Court

City/State/Zip: CHICAGO, IL 60601

Telephone: 312-558-9800

Date: OCTOBER 29, 2012

- ☐ I served this subpoena by mailing a copy, as required by Ill. Sup. Ct. Rules 11, 12 and 204(a)(2), to _____
by certified mail, return receipt requested (Receipt # _____) on _____,
I paid the witness \$ _____ for witness and mileage fees.
- ☐ I served this subpoena by handing a copy to _____ on _____,
I paid the witness \$ _____ for witness and mileage fees.

(Signature of Server)

(Print Name)

ATTACHMENT 3

E39572-F

SUBJECT: DULBERG, PAUL

AKA: NOT PROVIDED

DOB: 03/19/1970

SSN: 323-76-4001

ALL DOCUMENTS AND RECORDS, INCLUDING, BUT NOT LIMITED TO, CD ROM, TAPE DRIVE, FLOPPY DRIVE, HARD DRIVE, SCANNED DOCUMENTS, EMAIL CORRESPONDENCE AND ALL OTHER DOCUMENTS STORED ELECTRONICALLY OR DIGITALLY, INCLUDING ALL OFFICE, EMERGENCY ROOM, INPATIENT AND OUTPATIENT CHARTS AND RECORDS, PHYSICAL THERAPY RECORDS, INCLUDING SIGN-IN SHEETS, COPIES OF ALL PRINTED MATERIAL DESCRIBING EXERCISES PRESCRIBED AND DOCUMENTATION WHICH INDICATES DATES AND TIMES OF PATIENT'S APPOINTMENTS, PHOTOGRAPHS, INSURANCE DOCUMENTS, ALL BILLING RECORDS, INCLUDING, BUT NOT LIMITED TO, ANY INSURANCE BILLING OR PAYMENT INFORMATION, ITEMIZED STATEMENTS OF CHARGES, PAYMENT AND WRITE-OFF RECORDS AND PAYMENT TRANSACTIONS, FROM ALL SOURCES, AND ALL PAYMENT HISTORY, PERTAINING TO THE CARE, TREATMENT AND EXAMINATION OF THE PATIENT, REGARDLESS OF TREATMENT DATE.

INCLUDE ANY AND ALL RECORDS FOR TREATMENT RENDERED BY DR. MARCUS TALERICO

ATTORNEY OR PARTY WITHOUT ATTORNEY:		TELEPHONE NO	FOR COURT USE ONLY
PERRY A. ACCARDO LAW OFFICE OF M. GERARD GREGOIRE 200 NORTH LASALLE STREET, SUITE 2650, CHICAGO, IL 60601		(312) 558-9800	
ATTORNEY FOR: GAGNON			
NAME OF COURT: CIRCUIT COURT FOR THE STATE OF ILLINOIS POST OFFICE & FOR THE COUNTY OF MCHENRY STREET ADDRESS 2200 NORTH SEMINARY AVENUE, WOODSTOCK, IL 60098			
PLAINTIFF/PETITIONER: DULBERG DEFENDANT/RESPONDENT: GAGNON, ET AL. CASE NUMBER: 12LA000178			
NOTICE OF DEPOSITION			

NOTICE TO ALL PARTIES AND THEIR ATTORNEY(S):

1. The production of documents by the Custodian of Records of the following business will be required as follows:

M IDAMERICA HAND TO SHOULDER
14-19 PETERSON ROAD, LIBERTYVILLE, IL 60048

DATE	TIME
11/15/2012	09:00 AM

Date: October 29, 2012

PERRY A. ACCARDO

(Type or Print Name)

[S] PERRY A. ACCARDO

(Signature)

ATTORNEY AT LAW

(Title)

NOTICE OF DEPOSITION

IN THE CIRCUIT COURT OF THE TWENTYSECOND JUDICIAL CIRCUIT, MCHENRY COUNTY, ILLINOIS

DU LBERG

Plaintiff/Petitioner

v.

No. 12LA000178

GAGNON, ET AL.

Defendant/Respondent

SUBPOENA IN A CIVIL MATTER
(For Testimony and/or Documents)

To: FOX LAKE DYNAMIC HAND THERAPY

489 S. ROUTE 12, SUITE C

FOX LAKE, IL 60020

- ☐ 1. YOU ARE COMMANDED to appear to give your testimony before the Honorable _____
in Room _____, Illinois on _____,
at _____ m.
- ☐ 2. YOU ARE COMMANDED to appear and give your deposition testimony before a Notary Public at: _____
in Room _____, Illinois on _____,
at _____ m.
- ☒ 3. YOU ARE COMMANDED to mail the following documents in your possession or control to COMPEX LEGAL SERVICES, INC.
at 1016 WEST JACKSON BOULEVARD, SUITE 213, CHICAGO, IL 60607, on or before NOVEMBER 15, 2012
at 09:15 a.m.
(THIS IS FOR RECORDS ONLY. THERE WILL BE NO ORAL INTERROGATORIES.):

☒ Description continued on attached page(s).

YOUR FAILURE TO RESPOND TO THIS SUBPOENA WILL SUBJECT YOU TO PUNISHMENT FOR CONTEMPT OF THIS COURT.

Notice to Deponent:

- ☒ 1. The deponent is a public or private corporation, partnership, association, or governmental agency. The matter(s) on which examination is requested are as follows: TO OBTAIN FACTUAL INFORMATION RELATING TO THE NATURE AND EXTENT OF INJURIES AND/OR DAMAGES ALLEGED BY THE PARTIES IN THIS LAWSUIT AND NO OTHER MEANS OF PRODUCTION ARE AVAILABLE.

☐ Description continued on attached page(s).

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- ☐ 2. The deponent's testimony will be recorded by use of an audio-visual recording device, operated by _____
(Name of Recording Device Operator)
3. No discovery deposition of any party or witnesses shall exceed three hours regardless of the number of parties involved in the case, except by stipulation of the parties or by order upon showing that good cause warrants a lengthier examination. Ill. Sup. Ct. Rule 206(d).

Atty. No. _____ Pro Se 99500

Name: PERRY A. ACCARDO

Issued by: [S] PERRY A. ACCARDO

Signature

Atty. for: GAGNON

☒ Attorney

Address: 200 NORTH LASALLE STREET, SUITE 2650

☐ Clerk of Court

City/State/Zip: CHICAGO, IL 60601

Telephone: 312-558-9800

Date: OCTOBER 29, 2012

- ☐ I served this subpoena by mailing a copy, as required by Ill. Sup. Ct. Rules 11, 12 and 204(a)(2), to _____
by certified mail, return receipt requested (Receipt # _____) on _____,
I paid the witness \$ _____ for witness and mileage fees.
- ☐ I served this subpoena by handing a copy to _____ on _____,
I paid the witness \$ _____ for witness and mileage fees.

(Signature of Server)

(Print Name)

ATTACHMENT 3

E39572-G

SUBJECT: DULBERG, PAUL

AKA: NOT PROVIDED

DOB: 03/19/1970

SSN: 323-76-4001

ALL DOCUMENTS AND RECORDS, INCLUDING, BUT NOT LIMITED TO, CD ROM, TAPE DRIVE, FLOPPY DRIVE, HARD DRIVE, SCANNED DOCUMENTS, EMAIL CORRESPONDENCE AND ALL OTHER DOCUMENTS STORED ELECTRONICALLY OR DIGITALLY, INCLUDING ALL OFFICE, EMERGENCY ROOM, INPATIENT AND OUTPATIENT CHARTS AND RECORDS, PHYSICAL THERAPY RECORDS, INCLUDING SIGN-IN SHEETS, COPIES OF ALL PRINTED MATERIAL DESCRIBING EXERCISES PRESCRIBED AND DOCUMENTATION WHICH INDICATES DATES AND TIMES OF PATIENT'S APPOINTMENTS, PHOTOGRAPHS, INSURANCE DOCUMENTS, ALL BILLING RECORDS, INCLUDING, BUT NOT LIMITED TO, ANY INSURANCE BILLING OR PAYMENT INFORMATION, ITEMIZED STATEMENTS OF CHARGES, PAYMENT AND WRITE-OFF RECORDS AND PAYMENT TRANSACTIONS, FROM ALL SOURCES, AND ALL PAYMENT HISTORY, PERTAINING TO THE CARE, TREATMENT AND EXAMINATION OF THE PATIENT, REGARDLESS OF TREATMENT DATE.

ATTORNEY OR PARTY WITHOUT ATTORNEY:		TELEPHONE NO	FOR COURT USE ONLY
PERRY A. ACCARDO LAW OFFICE OF M. GERARD GREGOIRE 200 NORTH LASALLE STREET, SUITE 2650, CHICAGO, IL 60601		(312) 558-9800	
ATTORNEY FOR: GAGNON			
NAME OF COURT: CIRCUIT COURT FOR THE STATE OF ILLINOIS POST OFFICE & FOR THE COUNTY OF MCHENRY STREET ADDRESS 2200 NORTH SEMINARY AVENUE, WOODSTOCK, IL 60098			
PLAINTIFF/PETITIONER: DULBERG DEFENDANT/RESPONDENT: GAGNON, ET AL. CASE NUMBER: 12LA000178			
NOTICE OF DEPOSITION			

NOTICE TO ALL PARTIES AND THEIR ATTORNEY(S):

1. The production of documents by the Custodian of Records of the following business will be required as follows:

FOX LAKE DYNAMIC HAND THERAPY
489 S. ROUTE 12, SUITE C, FOX LAKE, IL 60020

DATE	TIME
11/15/2012	09:15 AM

Date: October 29, 2012

PERRY A. ACCARDO

(Type or Print Name)

[S] PERRY A. ACCARDO

(Signature)

ATTORNEY AT LAW

(Title)

NOTICE OF DEPOSITION

IN THE CIRCUIT COURT OF THE TWENTYSECOND JUDICIAL CIRCUIT, MCHENRY COUNTY, ILLINOIS

DULBERG

Plaintiff/Petitioner

v.

GAGNON, ET AL.

Defendant/Respondent

No. 12LA000178

SUBPOENA IN A CIVIL MATTER
(For Testimony and/or Documents)

To: FRANK SEK, MD

4606 WEST ELM STREET

MCHENRY, IL 60050

- ☐ 1. YOU ARE COMMANDED to appear to give your testimony before the Honorable _____
in Room _____, Illinois on _____,
at _____ m.
- ☐ 2. YOU ARE COMMANDED to appear and give your deposition testimony before a Notary Public at: _____
in Room _____, Illinois on _____,
at _____ m.
- ☒ 3. YOU ARE COMMANDED to mail the following documents in your possession or control to COMPLEX LEGAL SERVICES, INC.
at 1016 WEST JACKSON BOULEVARD, SUITE 213, CHICAGO, IL 60607, on or before NOVEMBER 15, 2012
at 09:30 a m.
(THIS IS FOR RECORDS ONLY. THERE WILL BE NO ORAL INTERROGATORIES.);

☒ Description continued on attached page(s).

YOUR FAILURE TO RESPOND TO THIS SUBPOENA WILL SUBJECT YOU TO PUNISHMENT FOR CONTEMPT OF THIS COURT.

Notice to Deponent:

- ☒ 1. The deponent is a public or private corporation, partnership, association, or governmental agency. The matter(s) on which examination is requested are as follows: TO OBTAIN FACTUAL INFORMATION RELATING TO THE NATURE AND EXTENT OF INJURIES AND/OR DAMAGES ALLEGED BY THE PARTIES IN THIS LAWSUIT AND NO OTHER MEANS OF PRODUCTION ARE AVAILABLE.

☐ Description continued on attached page(s).

(A nonparty organization has a duty to designate one or more officers, directors, or managing agents, or other persons to testify on its behalf, and may set forth, for each person designated, the matters on which that person will testify. Ill. Sup. Ct. Rule 206.)

- ☐ 2. The deponent's testimony will be recorded by use of an audio-visual recording device, operated by _____
(Name of Recording Device Operator)
3. No discovery deposition of any party or witnesses shall exceed three hours regardless of the number of parties involved in the case, except by stipulation of the parties or by order upon showing that good cause warrants a lengthier examination. Ill. Sup. Ct. Rule 206(d).

Atty. No. _____

Pro Se 99500

Name: PERRY A. ACCARDO

Issued by: [S] PERRY A. ACCARDO

Signature

Atty. For: GAGNON

☒ Attorney☐ Clerk of Court

Address: 200 NORTH LASALLE STREET, SUITE 2650

City/State/Zip: CHICAGO, IL 60601

Telephone: 312-558-9800

Date: OCTOBER 29, 2012

- ☐ I served this subpoena by mailing a copy, as required by Ill. Sup. Ct. Rules 11, 12 and 204(a)(2), to _____
by certified mail, return receipt requested (Receipt # _____) on _____
I paid the witness \$ _____ for witness and mileage fees.
- ☐ I served this subpoena by handing a copy to _____ on _____
I paid the witness \$ _____ for witness and mileage fees.

(Signature of Server)

(Print Name)

ATTACHMENT 3

E39572-H

SUBJECT: DULBERG, PAUL

AKA: NOT PROVIDED

DOB: 03/19/1970

SSN: 323-76-4001

ALL DOCUMENTS AND RECORDS, INCLUDING, BUT NOT LIMITED TO, CD ROM, TAPE DRIVE, FLOPPY DRIVE, HARD DRIVE, SCANNED DOCUMENTS, EMAIL CORRESPONDENCE AND ALL OTHER DOCUMENTS STORED ELECTRONICALLY OR DIGITALLY, INCLUDING ALL OFFICE, EMERGENCY ROOM, INPATIENT AND OUTPATIENT CHARTS AND RECORDS, PHYSICAL THERAPY RECORDS, INCLUDING SIGN-IN SHEETS, COPIES OF ALL PRINTED MATERIAL DESCRIBING EXERCISES PRESCRIBED AND DOCUMENTATION WHICH INDICATES DATES AND TIMES OF PATIENT'S APPOINTMENTS, PHOTOGRAPHS, INSURANCE DOCUMENTS, ALL BILLING RECORDS, INCLUDING, BUT NOT LIMITED TO, ANY INSURANCE BILLING OR PAYMENT INFORMATION, ITEMIZED STATEMENTS OF CHARGES, PAYMENT AND WRITE-OFF RECORDS AND PAYMENT TRANSACTIONS, FROM ALL SOURCES, AND ALL PAYMENT HISTORY, PERTAINING TO THE CARE, TREATMENT AND EXAMINATION OF THE PATIENT, REGARDLESS OF TREATMENT DATE.

INCLUDE RECORDS FOR SERVICES RENDERED AT 4601 WEST ROUTE 120, MCHENRY, IL 60050

ATTORNEY OR PARTY WITHOUT ATTORNEY:		TELEPHONE NO	FOR COURT USE ONLY
PERRY A. ACCARDO LAW OFFICE OF M. GERARD GREGOIRE 200 NORTH LASALLE STREET, SUITE 2650, CHICAGO, IL 60601		(312) 558-9800	
ATTORNEY FOR: GAGNON			
NAME OF COURT: CIRCUIT COURT FOR THE STATE OF ILLINOIS POST OFFICE & FOR THE COUNTY OF MCHENRY STREET ADDRESS 2200 NORTH SEMINARY AVENUE, WOODSTOCK, IL 60098			
PLAINTIFF/PETITIONER: DULBERG DEFENDANT/RESPONDENT: GAGNON, ET AL. CASE NUMBER: 12LA000178			
NOTICE OF DEPOSITION			

NOTICE TO ALL PARTIES AND THEIR ATTORNEY(S):

1. The production of documents by the Custodian of Records of the following business will be required as follows:

FRANK SEK, MD

4606 WEST ELM STREET, MCHENRY, IL 60050

DATE

TIME

11/15/2012

09:30 AM

Date: October 29, 2012

PERRY A. ACCARDO

(Type or Print Name)

[S] PERRY A. ACCARDO

(Signature)

ATTORNEY AT LAW

(Title)

NOTICE OF DEPOSITION

IN THE CIRCUIT COURT OF THE TWENTYSECOND JUDICIAL CIRCUIT, MCHENRY COUNTY, ILLINOIS

DULBERG

Plaintiff/Petitioner

v.

No. 12LA000178

GAGNON, ET AL.

Defendant/Respondent

SUBPOENA IN A CIVIL MATTER
(For Testimony and/or Documents)

To: **HAND SURGERY ASSOCIATES**
 515 WEST ALGONQUIN ROAD, SUITE 120
 AR LINGTON HEIGHTS, IL 60005

- ☐ 1. YOU ARE COMMANDED to appear to give your testimony before the Honorable _____
 in Room _____, Illinois on _____,
 at _____ m.
- ☐ 2. YOU ARE COMMANDED to appear and give your deposition testimony before a Notary Public at: _____
 in Room _____, Illinois on _____,
 at _____ m.
- ☒ 3. YOU ARE COMMANDED to mail the following documents in your possession or control to **COMPLEX LEGAL SERVICES, INC.**
 at **1016 WEST JACKSON BOULEVARD, SUITE 213, CHICAGO, IL 60607**, on or before **NOVEMBER 15**, 2012
 at **09:45** a m.
 (THIS IS FOR RECORDS ONLY. THERE WILL BE NO ORAL INTERROGATORIES.):

☒ Description continued on attached page(s).

YOU **OR** FAILURE TO RESPOND TO THIS SUBPOENA WILL SUBJECT YOU TO PUNISHMENT FOR CONTEMPT OF THIS COURT.

Notice to Deponent:

- ☒ 1. The deponent is a public or private corporation, partnership, association, or governmental agency. The matter(s) on which examination is requested are as follows: **TO OBTAIN FACTUAL INFORMATION RELATING TO THE NATURE AND EXTENT OF INJURIES AND/OR DAMAGES ALLEGED BY THE PARTIES IN THIS LAWSUIT AND NO OTHER MEANS OF PRODUCTION ARE AVAILABLE.**

☐ Description continued on attached page(s).

(A nonparty organization has a duty to designate one or more officers, directors, or managing agents, or other persons to testify on its behalf, and may set forth, for each person designated, the matters on which that person will testify. Ill. Sup. Ct. Rule 206.)

- ☐ 2. The deponent's testimony will be recorded by use of an audio-visual recording device, operated by _____
 (Name of Recording Device Operator)
3. No discovery deposition of any party or witnesses shall exceed three hours regardless of the number of parties involved in the case, except by stipulation of the parties or by order upon showing that good cause warrants a lengthier examination. Ill. Sup. Ct. Rule 206(d).

Atty. No. _____ Pro Se 99500

Name: **PERRY A. ACCARDO**

Issued by: **[S] PERRY A. ACCARDO**

Signature

Atty. for: **GAGNON**

☒ Attorney

Address: **200 NORTH LASALLE STREET, SUITE 2650**

☐ Clerk of Court

City/State/Zip: **CHICAGO, IL 60601**

Telephone: **312-558-9800**

Date: **OCTOBER 29**, 2012

- ☐ I served this subpoena by mailing a copy, as required by Ill. Sup. Ct. Rules 11, 12 and 204(a)(2), to _____
 by certified mail, return receipt requested (Receipt # _____) on _____,
 I paid the witness \$ _____ for witness and mileage fees.
- ☐ I served this subpoena by handing a copy to _____ on _____,
 I paid the witness \$ _____ for witness and mileage fees.

(Signature of Server)

(Print Name)

ATTACHMENT 3

E39572-I

SUBJECT: DULBERG, PAUL

AKA: NOT PROVIDED

DOB: 03/19/1970

SSN: 323-76-4001

ALL DOCUMENTS AND RECORDS, INCLUDING, BUT NOT LIMITED TO, CD ROM, TAPE DRIVE, FLOPPY DRIVE, HARD DRIVE, SCANNED DOCUMENTS, EMAIL CORRESPONDENCE AND ALL OTHER DOCUMENTS STORED ELECTRONICALLY OR DIGITALLY, INCLUDING ALL OFFICE, EMERGENCY ROOM, INPATIENT AND OUTPATIENT CHARTS AND RECORDS, PHYSICAL THERAPY RECORDS, INCLUDING SIGN-IN SHEETS, COPIES OF ALL PRINTED MATERIAL DESCRIBING EXERCISES PRESCRIBED AND DOCUMENTATION WHICH INDICATES DATES AND TIMES OF PATIENT'S APPOINTMENTS, PHOTOGRAPHS, INSURANCE DOCUMENTS, ALL BILLING RECORDS, INCLUDING, BUT NOT LIMITED TO, ANY INSURANCE BILLING OR PAYMENT INFORMATION, ITEMIZED STATEMENTS OF CHARGES, PAYMENT AND WRITE-OFF RECORDS AND PAYMENT TRANSACTIONS, FROM ALL SOURCES, AND ALL PAYMENT HISTORY, PERTAINING TO THE CARE, TREATMENT AND EXAMINATION OF THE PATIENT, REGARDLESS OF TREATMENT DATE.

INCLUDE ANY AND ALL RECORDS FOR TREATMENT RENDERED BY DR. SAGERMAN AND DR. BIAFORA

ATTORNEY OR PARTY WITHOUT ATTORNEY:		TELEPHONE NO	FOR COURT USE ONLY
PERRY A. ACCARDO LAW OFFICE OF M. GERARD GREGOIRE 200 NORTH LASALLE STREET, SUITE 2650, CHICAGO, IL 60601		(312) 558-9800	
ATTORNEY FOR: GAGNON			
NAME OF COURT: CIRCUIT COURT FOR THE STATE OF ILLINOIS POST OFFICE & FOR THE COUNTY OF MCHENRY STREET ADDRESS 2200 NORTH SEMINARY AVENUE, WOODSTOCK, IL 60098			
PLAINTIFF/PETITIONER: DULBERG DEFENDANT/RESPONDENT: GAGNON, ET AL. CASE NUMBER: 12LA000178			
NOTICE OF DEPOSITION			

NOTICE TO ALL PARTIES AND THEIR ATTORNEY(S):

1. The production of documents by the Custodian of Records of the following business will be required as follows:

HAND SURGERY ASSOCIATES

515 WEST ALGONQUIN ROAD, SUITE 120, ARLINGTON HEIGHTS, IL 60005

DATE

TIME

11/15/2012

09:45 AM

Date: October 29, 2012

PERRY A. ACCARDO

(Type or Print Name)

[S] PERRY A. ACCARDO

(Signature)

ATTORNEY AT LAW

(Title)

NOTICE OF DEPOSITION

IN THE CIRCUIT COURT OF THE TWENTYSECOND JUDICIAL CIRCUIT, MCHENRY COUNTY, ILLINOIS

DULBERG

Plaintiff/Petitioner

v.

GAGNON, ET AL.

Defendant/Respondent

No. 12LA000178

SUBPOENA IN A CIVIL MATTER
(For Testimony and/or Documents)

To: A MS SCREW PRODUCTS

2418 HIGHVIEW STREET

SPRING GROVE, IL 60081

- ☐ 1. YOU ARE COMMANDED to appear to give your testimony before the Honorable _____
in Room _____, Illinois on _____,
at _____ m.
- ☐ 2. YOU ARE COMMANDED to appear and give your deposition testimony before a Notary Public at:
in Room _____, Illinois on _____,
at _____ m.
- ☒ 3. YOU ARE COMMANDED to mail the following documents in your possession or control to COMPLEX LEGAL SERVICES, INC.
at 1016 WEST JACKSON BOULEVARD, SUITE 213, CHICAGO, IL 60607, on or before NOVEMBER 15, 2012
at 10:00 a.m.
(THIS IS FOR RECORDS ONLY. THERE WILL BE NO ORAL INTERROGATORIES.):

☒ Description continued on attached page(s).

YOUR FAILURE TO RESPOND TO THIS SUBPOENA WILL SUBJECT YOU TO PUNISHMENT FOR CONTEMPT OF THIS COURT.

Notice to Deponent:

- ☒ 1. The deponent is a public or private corporation, partnership, association, or governmental agency. The matter(s) on which examination is requested are as follows: TO OBTAIN FACTUAL INFORMATION RELATING TO THE NATURE AND EXTENT OF INJURIES AND/OR DAMAGES ALLEGED BY THE PARTIES IN THIS LAWSUIT AND NO OTHER MEANS OF PRODUCTION ARE AVAILABLE.

☐ Description continued on attached page(s).

(A nonparty organization has a duty to designate one or more officers, directors, or managing agents, or other persons to testify on its behalf, and may set forth, for each person designated, the matters on which that person will testify. Ill. Sup. Ct. Rule 206.)

- ☐ 2. The deponent's testimony will be recorded by use of an audio-visual recording device, operated by _____
(Name of Recording Device Operator)
3. No discovery deposition of any party or witnesses shall exceed three hours regardless of the number of parties involved in the case, except by stipulation of the parties or by order upon showing that good cause warrants a lengthier examination. Ill. Sup. Ct. Rule 206(d).

Atty. No. _____

Pro Se 99500

Name: PERRY A. ACCARDO

Issued by: [S] PERRY A. ACCARDO

Signature

Atty. for: GAGNON

Address: 200 NORTH LASALLE STREET, SUITE 2650

City/State/Zip: CHICAGO, IL 60601

Telephone: 312-558-9800

Date: OCTOBER 29, 2012

- ☐ I served this subpoena by mailing a copy, as required by Ill. Sup. Ct. Rules 11, 12 and 204(a)(2), to _____
by certified mail, return receipt requested (Receipt # _____) on _____,
I paid the witness \$ _____ for witness and mileage fees.
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(Signature of Server)

(Print Name)

ATTACHMENT 3

E39572-J

SUBJECT: DULBERG, PAUL

AKA: NOT PROVIDED

DOB: 03/19/1970

SSN: 323-76-4001

ALL DOCUMENTS AND RECORDS PERTAINING TO THE EMPLOYMENT AND/OR EARNINGS OF THE PLAINTIFF, INCLUDING ALL PAYROLL, THE APPLICATION FOR EMPLOYMENT, WORK ABSENCE RECORDS, 1099 FORMS, INCIDENT REPORTS, TIME CARDS, AND PRE-EMPLOYMENT AND EMPLOYEE PERFORMANCE RECORDS, FROM THE FIRST DATE OF EMPLOYMENT, UP TO AND INCLUDING THE PRESENT.

ATTORNEY OR PARTY WITHOUT ATTORNEY:		TELEPHONE NO	FOR COURT USE ONLY
PERRY A. ACCARDO LAW OFFICE OF M. GERARD GREGOIRE 200 NORTH LASALLE STREET, SUITE 2650, CHICAGO, IL 60601		(312) 558-9800	
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NOTICE OF DEPOSITION			

NOTICE TO ALL PARTIES AND THEIR ATTORNEY(S):

1. The production of documents by the Custodian of Records of the following business will be required as follows:

	DATE	TIME
AMIS SCREW PRODUCTS		
24 18 HIGHVIEW STREET, SPRING GROVE, IL 60081	11/15/2012	10:00 AM

Date: October 29, 2012

PERRY A. ACCARDO

(Type or Print Name)

[S] PERRY A. ACCARDO

(Signature)

ATTORNEY AT LAW

(Title)

NOTICE OF DEPOSITION

I am employed in LOS ANGELES County, California. I am over the age of 18 and not a party to the within action; my business address is: 1016 WEST JACKSON BOULEVARD, SUITE 213, CHICAGO, IL 60607

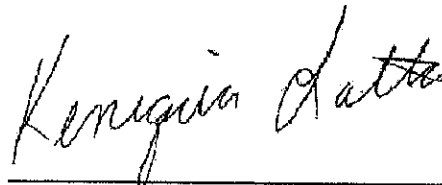
On 10/30/12, I gave notice to: SEE SERVICE LIST BELOW

On the above date, I served true copies of the following documents;
Subpoena

To each party appearing in this action, at the address below, by placing true copies thereof enclosed in a sealed envelope with postage fully pre-paid, in the United States mail at 325 MAPLE AVENUE, TORRANCE, CA 90503

I declare under penalty of perjury under the laws of the State of Illinois that the foregoing is true and correct, and that this declaration was executed on 10/30/12.

SIGNED: _____



Keniqua Latta

THOMAS J. POPOVICH, P.C.
HANS A. MAST
3416 W. ELM ST
MCHENRY, IL 60050

CICERO, FRANCE, BARCH & ALEXANDER, P.C.
CICERO, FRANCE, BARCH & AL
6323 EAST RIVERSIDE BOULEVARD
ROCKFORD, IL 61114