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July 24, 2012

Ronald A. Barch
Cicero, France, Barch & Alexander, PC
6323 E. Riverside Blvd.
Rockford, IL 61114

RE: *Paul Dulberg vs. David Gagnon, Caroline McGuire and Bill McGuire*
McHenry County Case: 12 LA 178

Dear Mr. Barch:

Pursuant to your Rule 214 Request for Production directed to the Plaintiff, please be advised as follows:

1. See medical expense report itemizing bills (with bills attached) in the amount of \$7,313.43. Plaintiff is still treating and bills are coming treaters including Associates in Neurology, Dr. Frank Sek, Fox Lake Dynamic Hand Therapy, Hand Surgery Associates and Dr. Sagerman/Biafora, Mid-America Hand to Shoulder Clinic and Dr. Talerico, Northern Illinois Medical Center and Northwest Community Hospital. Investigation continues.
2. See response to No. 1 above.
3. Attached are photographs of the injuries and/or defendants or parties in the case. Investigation continues.
4. See response to No. 1 above. Medical records are attached obtained thus far from Drs. Karen Levin at Associated Neurology, Northern Illinois Medical Center, Mid-America Hand to Shoulder Clinic and Open Advanced MRI. Investigation continues.
5. See response to No. 4 above.
6. Objection, improper 214 request.
7. None known at this time. Investigation continues.

8. See response to No. 1 above.
9. None, other than the recorded statement of the Defendant, David Gagnon - transcription attached.
10. The undersigned attorney verifies and certifies that the above-responses are true and correct to the best of his belief and knowledge except where investigation continues.

Very truly yours,

A handwritten signature in black ink, appearing to be 'Hans A. Mast', written over the typed name.

HANS A. MAST

smq
Enclosures

THOMAS J. POPOVICH, P.C.
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ATTN: HANS A. MAST

CASE NAME: DULBERG v GAGNON, ET AL.

Drisc
Not
asked