

CICERO, FRANCE, BARCH & ALEXANDER, P.C.

A Professional Corporation

Attorneys at Law

6323 EAST RIVERSIDE BOULEVARD
ROCKFORD, ILLINOIS 61114

PAUL R. CICERO
JOHN W. FRANCE
RONALD A. BARCH
CHARLES P. ALEXANDER

CHANTEL R. BIELSKIS
ANDREW T. SMITH

TEL: (815) 226-7700

FAX: (815) 226-7701

November 4, 2013

Mr. Mike Thomas
460 Walbeck Drive
Twin Lakes, WI 53181

COPY

Case: *Paul Dulberg v. David Gagnon, Caroline McGuire and Bill McGuire*
(McHenry County Case No. 12 LA 178)

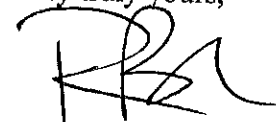
Dear Mr. Thomas:

Enclosed you will find a deposition subpoena and notice of deposition setting your deposition for January 17, 2014, at 1:00 p.m. in the law offices of Thomas J. Popovich, 3416 West Elm Street, McHenry, Illinois. For planning purposes, I am predicting that your deposition will last about an hour or so.

Upon receipt of this letter and the enclosed subpoena, please give me a call at 815/226-7700 to confirm that you are available for deposition on the date and at the time selected. If the date or time selected poses a schedule conflict for you, we can make an attempt to secure a date and time convenient to you, the court reporter and the attorneys involved. When you call I also want to secure an accurate phone number from you so that I have a way to communicate with you if any problems develop on your end or ours.

I look forward to hearing from you at your earliest convenience. Thank you.

Very truly yours,



RONALD A. BARCH

RB:mj:34ltr.MT

Encl.

CC Perry Accardo
Hans Mast
Tom Malatia (Claim No. 13-2779-11)

I HEREBY CERTIFY that on 1/31/13, a true and correct copy of the foregoing Answers to Interrogatories were filed with the Clerk of the Circuit Court of McHenry County and a copy of same was also mailed to:

Hans A. Mast
Law Offices of Thomas J. Popovich, P.C.
3416 W Elm St
McHenry IL 60050

Attorney for Plaintiff(s) Paul Dulberg

Cicero, France, Barch & Alexander PC
6323 East Riverside Blvd
Rockford, IL 61114

Attorney for Co-Defendants, Caroline and Bill McGuire

LAW OFFICE OF M. GERARD GREGOIRE
200 N LaSalle St Ste 2650
Chicago, IL 60601-1092
Telephone: 312-558-9821

By: 

PERRY A. ACCARDO

Firm No.: 46878

E-MAIL ADDRESS:

ILLINOISLEGAL@ALLSTATE.COM

Attorney Bar No.: 6228720

Attorney for Defendant(s):

David Gagnon

(Notary Public)

CICERO, FRANCE, BARCH & ALEXANDER, P.C.

A Professional Corporation

Attorneys at Law

6323 EAST RIVERSIDE BOULEVARD

ROCKFORD, ILLINOIS 61114

PAUL R. CICERO
JOHN W. FRANCE
RONALD A. BARCH
CHARLES P. ALEXANDER

TEL: (815) 226-7700

FAX: (815) 226-7701

CHANTEL R. BIELSKIS
ANDREW T. SMITH

July 25, 2013

Attorney Hans A. Mast
Law Offices of Thomas J. Popovich, PC
3416 West Elm Street
McHenry, IL 60050

Case: *Paul Dulberg v. David Gagnon, Caroline McGuire and Bill McGuire*
(McHenry County Case No. 12 LA 178)

Dear Mr. Mast:

With respect to Mike Thomas' discovery deposition, I am currently available during the afternoon of August 13, after court on August 14, the afternoon of August 15, and any time on August 20, August 21, August 22 or August 23.

Thank you for agreeing to make arrangements for Mr. Thomas to appear. I look forward to hearing back from you on a date that works for you, Mr. Thomas and Mr. Accardo.

For communication purposes, I will be out of the office 7/26 through 8/5. In my absence, feel free to have your deposition assistant work with my assistant Marlene Johnson. Hopefully we can report the deposition scheduled when we are next in court.

Very truly yours,



RONALD A. BARCH

RB:mj\30ltr.HAM

cc Tom Malatia (Claim No. 13-2779-11)
Attorney Perry Accardo

*please set
in dep*