

STATE OF ILLINOIS  
IN THE CIRCUIT COURT OF THE 22<sup>ND</sup> JUDICIAL CIRCUIT  
COUNTY OF McHENRY

PAUL DULBERG,  
Plaintiff,

vs.

DAVID GAGNON, Individually, and as  
Agent of CAROLINE MCGUIRE and BILL  
MCGUIRE, and CAROLINE MCGUIRE  
and BILL MCGUIRE, Individually,  
Defendants.

Case No. 12 LA 178

**NOTICE OF DEPOSITIONS**  
**(for Records Only)**

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

*Not  
ordered*

YOU ARE HEREBY NOTIFIED that on September 19, 2012, at 9:00 A.M. at 6323 East Riverside Blvd., Rockford, IL 61114, the depositions of the Medical Records Custodians of MidAmerica Orthopaedics, 755 South Milwaukee Avenue, Libertyville, IL 60048-3266; MidAmerica Hand to Shoulder Clinic, 1419 Peterson Road, Libertyville, IL 60048; Associated Neurology, S.C., 1900 Hollister Drive, Suite 250, Libertyville, IL 60048; Centegra Northern Illinois Medical Center, 4201 Medical Center Drive, McHenry, IL 60050; and Dr. Frank Sek, 4606 West Elm Street, McHenry, IL 60050, will be taken for discovery in this case.

**THERE WILL BE NO INTERROGATION OF THE DEPONENT.**

  
\_\_\_\_\_  
RONALD A. BARCH (6209572)

Cicero, France, Barch & Alexander, P.C.  
6323 East Riverside Blvd.  
Rockford, IL 61114  
815/226-7700 fax: 815/226-7701

**CERTIFICATE OF SERVICE**

I certify that on September 4, 2012, I served this notice by mailing a copy to each person to whom it is directed.

  
\_\_\_\_\_

RONALD A. B.

OFFICIAL SEAL  
MARLENE M JOHNSON  
NOTARY PUBLIC - STATE OF ILLINOIS  
MY COMMISSION EXPIRES 08/29/13

OFFICIAL SEAL  
MARLENE M JOHNSON  
NOTARY PUBLIC, STATE OF ILLINOIS  
COMMISSION EXPIRES: 09/25/13

**DIAL SEAL**  
**MARLENE M JOHNSON**  
**TARY PUBLIC STATE OF ILLINOIS**  
**MISSION EXPIRES:09/29/13**

STATE OF ILLINOIS  
IN THE CIRCUIT COURT OF THE 22<sup>ND</sup> JUDICIAL CIRCUIT  
COUNTY OF McHENRY

PAUL DULBERG,  
Plaintiff,

vs.

DAVID GAGNON, Individually, and as  
Agent of CAROLINE MCGUIRE and BILL  
MCGUIRE, and CAROLINE MCGUIRE  
and BILL MCGUIRE, Individually,  
Defendants.

)  
) Case No. 12 LA 178  
)  
)  
)  
)  
)  
)  
)  
)  
)

**SUBPOENA FOR DEPOSITION**  
**(for Records Only)**

TO: Release of Information/Medical Records Custodian  
c/o Mid America Hand to Shoulder Clinic  
1419 Peterson Road  
Libertyville, IL 60048

YOU ARE COMMANDED to appear to give your deposition before a notary public at  
6323 East Riverside Blvd., Rockford, Illinois 61114, on September 19, 2012, at 9:00 A.M.

YOU ARE COMMANDED ALSO to produce the following: The complete medical  
records file and medical statements for services pertaining to the care and treatment of **PAUL  
DULBERG (B/D: 3/19/70)** from January 1, 2006 to the present date, exclusive of x-ray films, in  
your possession or control.

**YOUR APPEARANCE IS NOT MANDATORY IF SAID DOCUMENTS ARE  
PROVIDED TO ATTORNEY RONALD A. BARCH ON OR BEFORE SEPTEMBER 18,  
2012, AT 5:00 P.M. YOUR FAILURE TO APPEAR IN RESPONSE TO THIS SUBPOENA  
WILL SUBJECT YOU TO PUNISHMENT FOR CONTEMPT OF THIS COURT.**

ATTORNEY RONALD A. BARCH  
6323 East Riverside Blvd.  
Rockford, IL 61114  
815/226-7700 815/226-7701 (fax)

CICERO, FRANCE, BARCH & ALEXANDER, PC.

BY: 

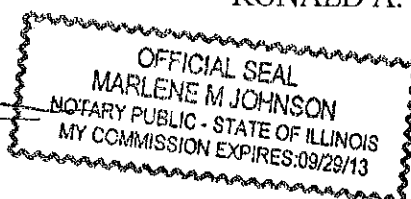
RONALD A. BARCH (6209572)

I served the subpoena by mailing a copy to the Medical Records Custodian c/o Mid America  
Hand to Shoulder Clinic on September 4, 2012. I paid the witness \$20.00 for witness fees.

Signed and sworn to before  
me on September 4, 2012.

  
RONALD A. BARCH

  
(Notary Public)



OFFICIAL SEAL  
MARLENE M JOHNSON  
NOTARY PUBLIC - STATE OF ILLINOIS  
MY COMMISSION EXPIRES:09/29/13

**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

September 4, 2012

Release of Information/Medical Records Custodian  
c/o Associated Neurology, S.C.  
1900 Hollister Drive, Suite 250  
Libertyville, IL 60048

**Re: *Paul Dulberg v. Carolyn McGuire and Bill McGuire***  
**McHenry County Case No. 12 LA 178**  
**Records of: Paul Dulberg (B/D: 3/19/70)**

Dear Medical Records Custodian:

Enclosed with this letter is a Subpoena for Deposition, a HIPAA Records Release Authorization and a check in the amount of \$20.00, the legal witness fee.

Please be advised that your appearance on the date indicated is not necessary. You may comply with the subpoena by mailing legible copies of all medical records, medical statements for services and medical reports of Paul Dulberg for the dates requested in the subpoena, in your possession or subject to your control.

Please note that we represent Carolyn McGuire and Bill McGuire in this case and not your patient. Since we do not represent the patient, we cannot discuss the substance of your care or the pending lawsuit with you outside the presence of your patient's attorney. If you have questions about how to comply with the subpoena, you may call my secretary, but neither she nor I can talk to you about any aspect of the lawsuit or the patient's medical treatment. Thank you in advance for your professional cooperation.

Very truly yours,

Cicero, France, Barch & Alexander, P.C.

  
RONALD A. BARCH

RB:nj/subltr.records

encls.

cc: Attorney Hans A. Mast

**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

September 4, 2012

Release of Information/Medical Records Custodian  
c/o Centegra Northern Illinois Medical Center  
4201 Medical Center Drive  
McHenry, IL 60050

**Re: Paul Dulberg v. Carolyn McGuire and Bill McGuire**  
**McHenry County Case No. 12 LA 178**  
**Records of: Paul Dulberg (B/D: 3/19/70)**

Dear Medical Records Custodian:

Enclosed with this letter is a Subpoena for Deposition, a HIPAA Records Release Authorization and a check in the amount of \$20.00, the legal witness fee.

Please be advised that your appearance on the date indicated is not necessary. You may comply with the subpoena by mailing legible copies of all medical records, medical statements for services and medical reports of Paul Dulberg for the dates requested in the subpoena, in your possession or subject to your control.

Please note that we represent Carolyn McGuire and Bill McGuire in this case and not your patient. Since we do not represent the patient, we cannot discuss the substance of your care or the pending lawsuit with you outside the presence of your patient's attorney. If you have questions about how to comply with the subpoena, you may call my secretary, but neither she nor I can talk to you about any aspect of the lawsuit or the patient's medical treatment. Thank you in advance for your professional cooperation.

Very truly yours,

Cicero, France, Barch & Alexander, P.C.

  
RONALD A. BARCH

RB:mj/subltr.records

encls.

cc: Attorney Hans A. Mast



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

September 4, 2012

Release of Information/Medical Records Custodian  
c/o Dr. Frank Sek  
4606 West Elm Street  
McHenry, IL 60050

Re: *Paul Dulberg v. Carolyn McGuire and Bill McGuire*  
McHenry County Case No. 12 LA 178  
Records of: Paul Dulberg (B/D: 3/19/70)

Dear Medical Records Custodian:

Enclosed with this letter is a Subpoena for Deposition, a HIPAA Records Release Authorization and a check in the amount of \$20.00, the legal witness fee.

Please be advised that your appearance on the date indicated is not necessary. You may comply with the subpoena by mailing legible copies of all medical records, medical statements for services and medical reports of Paul Dulberg for the dates requested in the subpoena, in your possession or subject to your control.

Please note that we represent Carolyn McGuire and Bill McGuire in this case and not your patient. Since we do not represent the patient, we cannot discuss the substance of your care or the pending lawsuit with you outside the presence of your patient's attorney. If you have questions about how to comply with the subpoena, you may call my secretary, but neither she nor I can talk to you about any aspect of the lawsuit or the patient's medical treatment. Thank you in advance for your professional cooperation.

Very truly yours,

Cicero, France, Barch & Alexander, P.C.

RONALD A. BARCH

RB:mj/subltr.records

encls.

cc: Attorney Hans A. Mast

**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

September 4, 2012

Release of Information/Medical Records Custodian  
c/o MidAmerica Hand to Shoulder Clinic  
1419 Peterson Road  
Libertyville, IL 60048

Re: *Paul Dulberg v. Carolyn McGuire and Bill McGuire*  
McHenry County Case No. 12 LA 178  
Records of: Paul Dulberg (B/D: 3/19/70)

Dear Medical Records Custodian:

Enclosed with this letter is a Subpoena for Deposition, a HIPAA Records Release Authorization and a check in the amount of \$20.00, the legal witness fee.

Please be advised that your appearance on the date indicated is not necessary. You may comply with the subpoena by mailing legible copies of all medical records, medical statements for services and medical reports of Paul Dulberg for the dates requested in the subpoena, in your possession or subject to your control.

Please note that we represent Carolyn McGuire and Bill McGuire in this case and not your patient. Since we do not represent the patient, we cannot discuss the substance of your care or the pending lawsuit with you outside the presence of your patient's attorney. If you have questions about how to comply with the subpoena, you may call my secretary, but neither she nor I can talk to you about any aspect of the lawsuit or the patient's medical treatment. Thank you in advance for your professional cooperation.

Very truly yours,

Cicero, France, Barch & Alexander, P.C.

  
RONALD A. BARCH

RB:mj/subltr.records

encls.

CC: Attorney Hans A. Mast