PAUL DULBERG, Plaintiff,) Case No. 12 LA 178
VS.)
DAVID GAGNON, Individually, and as Agent of CAROLINE MCGUIRE and BILL MCGUIRE, and CAROLINE MCGUIRE and BILL MCGUIRE, Individually, Defendants.))))))) NOTICE OF DEPOSITIONS) (for Records Only))
TO: Attorney Hans A. Mast Law Offices of Thomas J. Popovich 3416 West Elm Street McHenry, IL 60050	Moduel
VOILABE HEDEDY MORRIES A	

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.

COONTT	OI. MICHEME I	
PAUL DULBERG, Plaintiff, vs.) Case No. 12 LA 178)	
DAVID GAGNON, Individually, and as Agent of CAROLINE MCGUIRE and BILL MCGUIRE, and CAROLINE MCGUIRE and BILL MCGUIRE, Individually, Defendants.))))) SUBPOENA FOR DEPOSITION (for Records Only)	
TO: Release of Information/Medical Records c/o Associated Neurology, S.C. 1900 Hollister Drive, Suite 250 Libertyville, IL 60048	s Custodian	
YOU ARE COMMANDED to appear 6323 East Riverside Blvd., Rockford, Illinois 61	to give your deposition before a notary public at 114, 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.		
TROVIDED TO ATTORNEY RONALD A	IANDATORY IF SAID DOCUMENTS ARE BARCH ON OR BEFORE SEPTEMBER 18, APPEAR IN RESPONSE TO THIS SUBPOENAR CONTEMPT OF THIS COURT.	
Dealer 1 II Could blyd,	ICERO, FRANCE, BARCH & ALEXANDER, PC. Y:RONALD A. BARCH (6209572)	
I served the subpoena by mailing a copy	y to the Medical Records Custodian c/o Associated	
Neurology, S.C. on September 4, 2012. I paid th	ne witness \$20.00 for witness fees.	
Signed and sworn to before	RONALD A. BARCH	
me on September 4, 2012.	OFFICIAL SEAL	
Coule Color NOTARY	PUBLIC STATE TO	
(Notary Public)	MISSICH EXPLRES OF LICENSES	

PAUL DULBERG, Plaintiff,) Case No. 12 LA 178
Vs.)
DAVID GAGNON, Individually, and as Agent of CAROLINE MCGUIRE and BILL MCGUIRE, and CAROLINE MCGUIRE and BILL MCGUIRE, Individually, Defendants.	SUBPOENA FOR DEPOSITION (for Records Only)
TO: Release of Information/Medical Records c/o Centegra Northern Illinois Medical Center Drive McHenry, IL 60050	s Custodian Center
YOU ARE COMMANDED to appear 6323 East Riverside Blvd., Rockford, Illinois 61	to give your deposition before a notary public a 114, on September 19, 2012, at 9:00 A.M.
and medical statements for service	o produce the following: The complete medica bes pertaining to the care and treatment of PAUI 006 to the present date, exclusive of x-ray films, in
PROVIDED TO ATTORNEY RONALD A	MANDATORY IF SAID DOCUMENTS ARE BARCH ON OR BEFORE SEPTEMBER 18 APPEAR IN RESPONSE TO THIS SUBPOENA OR CONTEMPT OF THIS COURT.
Rockford, IL 61114 B	ICERO, FRANCE, BARCH & ALEXANDER, PC
815/226-7700 815/226-7701 (fax)	RONALD A. BARCH (6209572)
I served the subpoena by mailing a cop Northern Illinois Medical Center on September	py to the Medical Records Custodian c/o Centegra 4, 2012. I paid the witness \$20.00 for witness fees.
Signed and sworn to before	RONALD A. BARCH
me on September 4, 2012.	ICIAL SEAL
MARLE MARLE	ME M JOHNSON LIC- STATE OF ILLINOIS
(Notary Public)	TO STATE OF ILLINOIS &

PAUL I	DULBERG, Plaintiff,)	Case No. 12 LA 178
DAVID Agent of MCGU	vs. OGAGNON, Individually, and as of CAROLINE MCGUIRE and BILL IRE, and CAROLINE MCGUIRE LL MCGUIRE, Individually, Defendants.)	SUBPOENA FOR DEPOSITION (for Records Only)
	Release of Information/Medical Records c/o Dr. Frank Sek 4606 West Elm Street McHenry, IL 60050	Cus	todian
6323 Ea	YOU ARE COMMANDED to appear ast Riverside Blvd., Rockford, Illinois 61	to g 114,	give your deposition before a notary public at on September 19, 2012, at 9:00 A.M.
DULB	file and medical statements for service	es pe	oduce the following: The complete medical ertaining to the care and treatment of PAUL to the present date, exclusive of x-ray films, in
2012, A	IDED TO ATTORNEY RONALD A.	BA APP	DATORY IF SAID DOCUMENTS ARE RECH ON OR BEFORE SEPTEMBER 18, EAR IN RESPONSE TO THIS SUBPOENA ONTEMPT OF THIS COURT.
6323 E Rockfo	RNEY RONALD A. BARCH Clast Riverside Blvd. rd, IL 61114 B'6-7700 815/226-7701 (fax)		RO, FRANCE, BARCH & ALEXANDER, PC. RONALD A. BARCH (6209572)
Sek on	I served the subpoena by mailing a cop September 4, 2012. I paid the witness \$2	y to 20.00	the Medical Records Custodian c/o Dr. Frank
me on S	and sworn to before September 4, 2012 MARLEIE M JOHNSO Y Public STATE OF IT Y Public)	DN LLINO 9/29/1:	

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PAUL DULBERG,	· · · · · · · · · · · · · · · · · · ·
Plaintiff,) Case No. 12 LA 178
vs.)
)
DAVID GAGNON, Individually, and as)
Agent of CAROLINE MCGUIRE and BILL MCGUIRE, and CAROLINE MCGUIRE) SUPPOEMA EOD DEDOCUEION
and BILL MCGUIRE, Individually,	SUBPOENA FOR DEPOSITION(for Records Only)
Defendants.	j
TO: Release of Information/Medical Record	s Custodian
c/o Mid America Hand to Shoulder Clir	
1419 Peterson Road Libertyville, IL 60048	
Diocity vine, ID 00048	
YOU ARE COMMANDED to appear	to give your deposition before a notary public a
6323 East Riverside Blvd., Rockford, Illinois 6	1114, on September 19, 2012, at 9:00 A.M.
YOU ARE COMMANDED ALSO t	o produce the following: The complete medica
records life and medical statements for service	ces pertaining to the care and treatment of PATH
your possession or control.	0006 to the present date, exclusive of x-ray films, in
YOUR APPEARANCE IS NOT I	MANDATORY IF SAID DOCUMENTS ARE
2012, AT 5:00 P.M. YOUR FAILURE TO	A. BARCH ON OR BEFORE SEPTEMBER 18 APPEAR IN RESPONSE TO THIS SUBPOENA
WILL SUBJECT YOU TO PUNISHMENT FO	OR CONTEMPT OF THIS COURT.
ATTORNEY RONALD A. BARCH	CICERO, FRANCE, BARCH & ALEXANDER, PC
6323 East Riverside Blvd.	$\langle \lambda \rangle \langle \lambda \rangle$
Rockford, IL 61114 E 815/226-7700 815/226-7701 (fax)	BY: DONALD BARGE (COOSES)
	RONALD Å. 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	RONALD A. BARCH
me on September 4, 2012.	PETCIAI CITA
Carlo Col NOTARY OF	C STAL SEAL
(Notary Public) MY COMM	JENE M JOHNSON JELIC - STATE OF ILLINOIS SSION EXPLORATIONS

PAUL DULBERG, Plaintiff,)
ramun,) Case No. 12 LA 178)
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TO: Release of Information/Medical Record c/o Mid America Orthopaedics 755 South Milwaukee Avenue Libertyville, IL 60048-3266	s Custodian
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0323 East Riverside Blvd.	EICERO, FRANCE, BARCH & ALEXANDER, PC. BY: RONALD A. BARCH (6209572)
I served the subpoena by mailing a copy Orthopaedics on September 4, 2012. I paid the	to the Medical Records Custodian c/o Mid America witness \$20.00 for witness fees.
Signed and sworn to before me on September 4, 2012.	RONALD A. BARCH
MARLEN MOTARY DI 1931	ICIAL SEAL NE M JOHNSON IC-STATE OF ILLINOIS
(Notary Public)	STATE OF ILLINOIS

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

September 4, 2012

CHANTEL R. BIELSKIS ANDREW T. SMITH

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 <u>not</u> necessary. You may comply with the subpoena by mailing legible copies of all medical records, <u>medical statements for services</u> 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

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

FAX: (815) 226-7701 September 4, 2012

TEL: (815) 226-7700

CHANTEL R. BIELSKIS ANDREW T. SMITH

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

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Cicero, France, Bargh 💸 Alexander, P.C.

RONALD A. BARCH

RB:mj/subltr.records

encis.

cc: Attorney Hans A. Mast

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

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September 4, 2012

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

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

RONALD A. BARCE

RB:mj/subltr.records encls.

cc:

Attorney Hans A. Mast

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

September 4, 2012

CHANTEL R. BIELSKIS ANDREW T. SMITH

> 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)

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cc: Attorney Hans A. Mast