

RES

IN THE CIRCUIT COURT OF THE 22ND JUDICIAL CIRCUIT
McHENRY COUNTY, ILLINOIS

MARK MCDONALD, individually, as)
Special Administrator of the Estate of Julie)
McDonald, and as father of Ian McDonald,)
Quinlin McDonald, and Chloe McDonald,)
minor children,)

Plaintiff,)

v.)

LAW OFFICES OF THOMAS J.)
POPOVICH, P.C., JAMES P. TUTAJ, and)
THOMAS J. POPOVICH,)

Defendants,)

No.: 12 LA 326

FILED

FEB 21 2013

KATHERINE M. KESSE
McHENRY CTY. CIR. CLK.

PLAINTIFF'S RESPONSE TO FIRST SET OF PRODUCTION REQUESTS

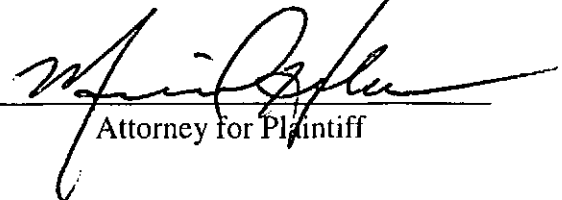
NOW COMES the Plaintiff, MARK MCDONALD, individually, as Special Administrator of the Estate of Julie McDonald, and as father of Ian McDonald, Quinlin McDonald, and Chloe McDonald, minor children, by and through his attorneys, ROMANUCCI & BLANDIN, LLC, in responding to the production requests of the Defendants, LAW OFFICES OF THOMAS J. POPOVICH, P.C., JAMES TUTAJ, and THOMAS J. POPOVICH, pursuant to the applicable Illinois Supreme Court Rules:

1. See attached CD.
2. Plaintiff did not specifically reference any documents in its Complaint at law. If there are documents Defendant believes were referenced in the Complaint at law, Plaintiff will produce any documents in its possession upon specific request.
3. Plaintiff is not in possession of said documents. Plaintiff reserves the right to seasonably supplement.
4. See attached CD.
5. Plaintiff is not in possession of said documents. Plaintiff reserves the right to seasonably supplement.

6. Plaintiff is not in possession of said documents. Plaintiff reserves the right to seasonably supplement.
7. See attached CD.
8. See attached CD.
9. None at this time. Plaintiff reserves the right to seasonably supplement.
10. Plaintiff is not in possession of said documents. Plaintiff reserves the right to seasonably supplement.
11. Plaintiff is not in possession of said documents. Plaintiff reserves the right to seasonably supplement.
12. None at this time. Plaintiff will make determinations regarding trial exhibits on a future date. Plaintiff reserves the right to seasonably supplement.
13. None at this time. Plaintiff reserves the right to seasonably supplement.
14. None at this time. Plaintiff reserves the right to seasonably supplement.
15. See attached CD.
16. None at this time.
17. See Attached.

Respectfully Submitted,
ROMANUCCI & BLANDIN, LLC

By: _____


Attorney for Plaintiff

Stephan D. Blandin
Michael E. Holden
ROMANUCCI & BLANDIN, LLC
33 North La Salle Street
Suite 2000
Chicago, Illinois 60602
Tel: (312) 458-1000
Fax: (312) 458-1004
Atty. No.: 35875

02/19/2013 10:52 3124581

VERIFICATION

The undersigned being first duly sworn upon oath and subject to penalty of perjury states that he has read the foregoing document, and the answers made herein are true in substance and in fact to the best of his belief and knowledge.


Mark McDonald

Subscribed and sworn to before me this,
the 19 day of February, 2013.


Notary Public

OFFICIAL SEAL
MICHAEL HOLDEN
Notary Public - State of Illinois
My Commission Expires Aug 4, 2013