## 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
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FAX: (815) 226-7701 October 3, 2012

TEL: (815) 226-7700

CHANTEL R. BIELSKIS ANDREW T. SMITH

> Personnel Records Keeper c/o AMS Screw Products 2418 Highview Spring Grove, IL 60081

> > Re:

Paul Dulberg v. Carolyn McGuire and Bill McGuire

McHenry County Case No. 12 LA 178

Personnel Records of: Paul Dulberg (B/D: 3/19/70)

Dear Medical Records Custodian:

Enclosed with this letter is a Subpoena for Deposition 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 the complete personnel record file of Paul Dulberg, as specified in the subpoena, in your possession or subject to your control.

Very truly yours,

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

RONALD A. BARCH

RB:mj/subitr.records.ams.screw

enols.

Attorney Hans A. Mast

Attorney Perry A. Accardo

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

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 DEPOSITION (for Records Only)
D'OTOTIGUTIO,	,	

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

> Attorney Perry A. Accardo Law Office of M. Gerard Gregoire 200 N. LaSalle Street, Suite 2650 Chicago, IL 60601-1092

YOU ARE HEREBY NOTIFIED that on October 18, 2012, at 9:00 A.M. at 6323 East Riverside Blvd., Rockford, IL 61114, the deposition of the Personnel Records Keeper of AMS SCREW PRODUCTS, whose address is 2418 Highview, Spring Grove, IL 60081, will be taken for discovery in this case.

THERE WILL BE NO INTERROGATION OF THE DEPONENT.

Rosel A Bul

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 October 3, 2012, I served this notice by mailing a copy to each person to whom it is directed.

Rowell A Bul

## STATE OF ILLINOIS IN THE CIRCUIT COURT OF THE $22^{ND}$ JUDICIAL CIRCUIT

(Notary Public)