

The Law Offices of Thomas J. Popovich P.C.

3416 W. ELM STREET
McHENRY, ILLINOIS 60050
TELEPHONE: 815.344.3797
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www.popovichlaw.com

THOMAS J. POPOVICH
HANS A. MAST
JOHN A. KORNAK

MARK J. VOGG
JAMES P. TUTAJ
ROBERT J. LUMBER
THERESA M. FREEMAN

November 28, 2012

Paul Dulberg
4606 Hayden Court
McHenry, IL 60051

RE: *Paul Dulberg vs. David Gagnon, Caroline McGuire and Bill McGuire*
McHenry County Case: 12 LA 178

Dear Paul:

Please be advised that the defense has scheduled your deposition to take place on December 27, 2012 at 1:30 p.m. at our office in McHenry. Please contact my assistant, Sheila upon receipt of this letter to confirm your availability for this date and to schedule a meeting with me one week prior to your deposition date so that I may prepare you for your testimony.

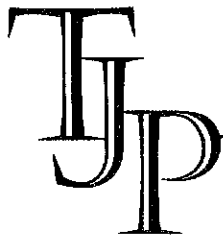
I look forward to meeting with you soon.

Very truly yours,


HANS A. MAST

21 st
10 AM.
2 hrs.

smq



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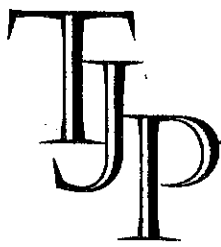
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October 17, 2012

Paul Dulberg
4606 Hayden Court
McHenry, IL 60051

RE: *Paul Dulberg vs. David Gagnon, Caroline McGuire and Bill McGuire*
McHenry County Case: 12 LA 178

Dear Paul:

Please find enclosed an Authorization to Furnish Medical/Employment Information form to obtain medical records on your behalf. Please sign the form and return it to me in the enclosed self-addressed stamped envelope at your earliest convenience.

Thank you for your cooperation.

Very truly yours,

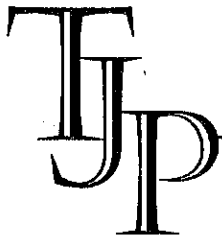
HANS A. MAST

smq
Enclosure

S:\Main\DULBERG, PAUL\Letters\Letter to client re auth 10-17-12.wpd

Done
10-29-12

WAUKEGAN OFFICE
210 NORTH MARTIN LUTHER
KING JR. AVENUE
WAUKEGAN, IL 60085



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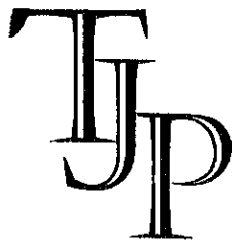
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September 12, 2012

Paul Dulberg
4606 Hayden Court
McHenry, IL 60051

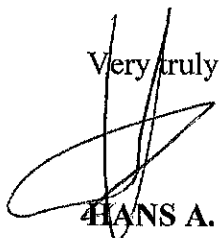
**RE: Paul Dulberg vs. David Gagnon, Caroline McGuire and Bill McGuire
McHenry County Case: 12 LA 178**

Dear Paul:

Please find enclosed your medical expense report itemizing your medical bills related to the underlying occurrence in the amount of \$40,633.21.

Please review the medical expense report and advise me if there are any bills that we are missing related to your care in this case.

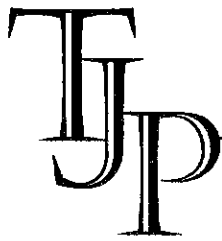
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HANS A. MAST

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Enclosures

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September 12, 2012

Paul Dulberg
4606 Hayden Court
McHenry, IL 60051

RE: *Paul Dulberg vs. David Gagnon, Caroline McGuire and Bill McGuire*
McHenry County Case: 12 LA 178

Dear Paul:

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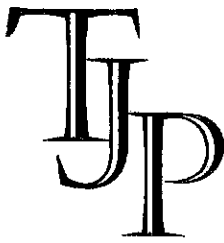
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HANS A. MAST

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Enclosures

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August 9, 2012

Paul Dulberg
4606 Hayden Court
McHenry, IL 60051

RE: *Paul Dulberg vs. David Gagnon, Caroline McGuire and Bill McGuire*
McHenry County Case: 12 LA 178

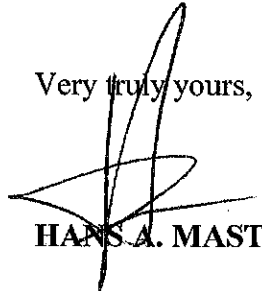
Dear Paul:

Please find enclosed HIPAA Records Release Authorization to obtain medical records on your behalf. Please sign the form and return it to me in the enclosed self-addressed stamped envelope at your earliest convenience.

Also, please find enclosed supplemental interrogatories (written questions) from defense counsel to answer. Please contact me upon receipt of this letter to answer the written questions.

Thank you for your cooperation.

Very truly yours,



HANS A. MAST

smq
Enclosures

S:\Main\DULBERG, PAUL\Letters\Letter to client re auth 8-9-12.wpd

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

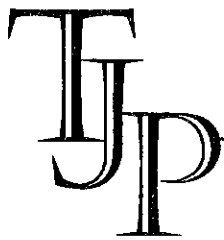
PAUL DULBERG,)	
)	
Plaintiff,)	Case No. 12 LA 178
)	
vs.)	
)	
DAVID GAGNON, Individually, and as)	
Agent of CAROLINE MCGUIRE and BILL)	
MCGUIRE, and CAROLINE MCGUIRE)	
and BILL MCGUIRE, Individually,)	
)	
Defendants.)	

DEFENDANT'S SUPPLEMENTAL INTERROGATORIES TO PLAINTIFF
(Medicare Secondary Payer Mandatory Reporting)

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

The Defendants, BILL MCGUIRE and CAROLYN MCGUIRE, by their attorneys, Cicero, France, Barch & Alexander, PC, hereby propounds the following supplemental written interrogatories upon PAUL DULBERG to be answered in writing and under oath within the time required by law based upon information available to him.

NOTE: The information requested through the following supplemental interrogatories is necessary so that the Defendants and any insurer of the Defendants can comply with the Medicare reporting obligations. See 42 U.S.C. 1395y(b)(7) & (b)(8), referred to commonly as the Medicare Secondary Payer Mandatory Reporting Provisions of Section 111 of the Medicare, Medicaid and SCHIP Extension Act of 2007.



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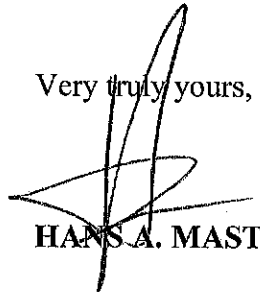
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