

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

11 JUL 16 11 09 47

CHRISTOPHER S. CYNOWA,)	
)	
Plaintiff,)	CLERK OF CIRCUIT COURT
)	LAW DIVISION
v.)	No. 08 L 403
)	
CSSS, INC., et al.,)	
)	
Defendants.)	

NOTICE TO PRODUCE AT TRIAL TO DEFENDANTS

Plaintiff, Christopher S. Cynowa, by his attorneys Theresa V. Johnson and Peter V. Bustamante, pursuant to Supreme Court Rule 237, requests that defendants CSSS, Inc., Lisa Wolford and Bill Slater, produce at the time this case is assigned to trial, and before the commencement of jury selection, the following (together with reports, memoranda, transcripts or records purporting to reflect the same):

1. Each and every diagram, sketch, model, movie, photograph, video tape, or other graphic or tangible reproduction or representation of any person, object or scene which is, or may be, involved in this lawsuit.
2. Each and every statement (oral, written or otherwise recorded) of any person, including the parties herein, regarding any issue or matter which is or may be involved in this lawsuit, and regardless of whether it was made pre-occurrence, occurrence or post-occurrence.
3. Each and every treatise, article, paper, text, encyclopedia or other document or material which defendants, or any of their witnesses, may use during trial.
4. Any and all investigator's reports or memoranda, including but not limited to reports reflecting conversations with witnesses, parties or anyone having knowledge or claiming to have knowledge regarding the factual allegations in plaintiff's complaint.

5. Any and all rules, regulations, by-laws, or guidelines of any public authority, association, licensing authority, accrediting authority, inspecting or reviewing authority or other private body which may be used in your defense.
6. All demonstrative evidence and exhibits which may be used during the trial of this case.
7. Copies of any and all trial subpoenas issued by the defendants in this case.
8. Any and all treatises, articles, abstracts, journals, textbooks or other literature, reports, notes, memoranda, exhibits, diagrams, pictures, motion pictures, video tapes, slides, graphs, charts and drawings which may be used by the defendants, or any of their witnesses during trial (including opinion witnesses) or during the cross examination of any of the plaintiff's witnesses (including the plaintiff and/or his opinion witnesses).
9. Any and all depositions, courtroom testimony or statements that may be used by the defendants in the cross examination of any witness (including the plaintiff and/or his opinion witnesses).
10. Each and every record, journal, statement, memorandum, document, list, diary or other writing or material relating to or supporting any of Christopher S. Cynowa's claims.
11. Each and every record, journal, statement, memorandum, document, list, diary or other writing or material relating to or supporting any of the defendants' claims or defenses.
12. Any and all employment records of Christopher S. Cynowa including, but not limited to, applications for employment, letters of reference, evaluation reports, and time records.
13. Any and all photographs, slides, motion pictures, video tapes of the parties, the scene of the occurrence or other objects involved in the occurrence.
14. With respect to any opinion witnesses you intend to call:

- (a) Their curriculum vitae.
- (b) All communications between defendants' counsel and said witnesses since they were retained in this case.
- (c) All invoices, bills, canceled checks, receipts, notes, memoranda or correspondence regarding money paid to said witnesses in connection with this case.
- (d) Any and all reports, memoranda, correspondence or other documentation regarding review, examinations or opinions to be offered at the trial.
- (e) Copies of all correspondence to and from each witness in connection with this case.
- (f) Copies of any and all deposition transcripts wherein defendants' witnesses testified as experts retained by defendants' counsel, or on behalf of any client of the defendant's law firm.
- (g) All textbooks, reference works, periodicals, standards or other published documents to which said witnesses may refer in their trial testimony or which they have provided defendants' counsel since they were retained in this case.
- (h) Each 213(f)(3) witnesses' entire file, including notes, opinions, bills, invoices, transcripts, medical records, reports, memos, photographs, standards or other documents that were made or used in connection with this case.
- (i) For each 213(f)(3) witness, a list of all cases for which defense counsel or their firms have retained the 213(f)(3) witness as an expert or opinion witness in other cases.
- (j) For each 213(f)(3) witness, a list setting forth the monies earned by retained SCR 213(f)(3) opinion witnesses from review, meeting, discussing and testifying regarding medical/legal matters for the last five years to the present.

15. The name, complete address and telephone number of each and every person having knowledge of any issue which is or may be involved in this lawsuit.

16. A list of any and all items which defendants may seek to put into evidence as exhibits in the trial of this case.


17. A list identifying each and every statute, ordinance, regulation, by-law, standard or other guideline of any federal, state or local government, or government affiliated organization or of any professional, licensing or review authority which defendants, defendants' counsel or any witness on their behalf may use during trial.

18. Lisa Wolford, for examination pursuant to Section 2-1102 of the Code of Civil Procedure.

19. Bill Slater, for examination pursuant to Section 2-1102 of the Code of Civil Procedure.

Dated: January 14, 2011

CHRISTOPHER S. CYNOWA

By: 
Peter V. Bustamante

Theresa V. Johnson
200 East Chicago Avenue
Suite 200
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(630) 321-1330
Attorney No. 37363

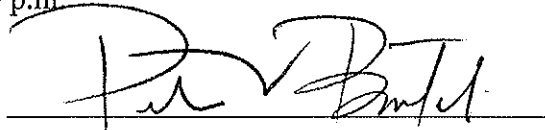
Peter V. Bustamante
150 North Michigan Avenue
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Chicago, Illinois 60601
(312) 346-2072
Attorney No. 70292

CERTIFICATE OF SERVICE

Under penalties as provided by law, the undersigned certifies that the above and foregoing **NOTICE TO PRODUCE AT TRIAL TO DEFENDANTS** was served upon:

Kevin B. Duff
Rachlis, Durham, Duff & Adler, LLC
542 South Dearborn Street
Suite 900
Chicago, Illinois 60605

by placing a true and accurate copy of the same in an envelope addressed as above and depositing the same in the United States Mail, first-class postage pre-paid, at Chicago, Illinois, on January 14, 2011, before the hour of 5:00 p.m.



A handwritten signature in black ink, appearing to read "Peter V. Bustamante", is written over a horizontal line.

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