

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

CHRISTOPHER S. CYNOWA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 08 L 403
	)	
CSSS, INC., et al.,	)	
	)	
Defendants.	)	

**NOTICE OF EMERGENCY MOTION**

<b>TO:</b>	Kevin B. Duff	Haytham Faraj
	Rachlis, Durham, Duff & Adler, LLC	1800 Diagonal Road
	542 South Dearborn Street	Suite 210
	Suite 900	Alexandria, VA 22314
	Chicago, Illinois 60605	Fax (202) 280-1039
	Fax (312) 733-3952	

**PLEASE TAKE NOTICE** that on Wednesday, March 23, 2011, at 11:00 a.m., or as soon thereafter as counsel may be heard, plaintiff shall appear before the Honorable William Maddux, or any judge sitting in his stead, in Room 2005, Daley Civic Center, Chicago, Illinois, and present the attached **EMERGENCY MOTION TO LIMIT THE EVIDENCE DEPOSITION OF LARRY CARVER**, a copy of which is attached hereto and served upon you herewith.

**CHRISTOPHER CYNOWA**  
/s Peter V. Bustamante

By:\_\_\_\_\_

**CERTIFICATE OF SERVICE**

The undersigned certifies that the above and foregoing Notice of Emergency Motion and attachment thereto was served, upon the persons to whom directed, by email and by placing a true and accurate copy of the same in an envelope, addressed as above and depositing the same in the U.S. Mail, first class postage pre-paid, on March 21, 2011, before the hour of 5:00 p.m.

/s Peter V. Bustamante

\_\_\_\_\_

Attorney No. 70292  
Peter V. Bustamante  
150 North Michigan, Suite 690  
Chicago, Illinois 60601  
(312) 346-2072

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

CHRISTOPHER S. CYNOWA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 08 L 403
	)	
CSSS, INC., et al.,	)	
	)	
Defendants.	)	

**EMERGENCY MOTION TO LIMIT  
THE EVIDENCE DEPOSITION OF LARRY CARVER**

Plaintiff, Christopher S. Cynowa, by his attorneys Theresa V. Johnson and Peter V. Bustamante, pursuant to Supreme Court Rule 211 and 213(f), moves this Honorable Court to limit the evidence deposition of Larry Carver and in support thereof states:

1. On March 18, 2011, the defendants served notice for the evidence deposition of Larry Carver, scheduled for March 29, 2011. A copy of the subpoena was served on counsel on March 21, 2011. A copy of the Notice and Subpoena are attached as Exhibit 1.
2. Mr. Carver’s deposition will be taken in Alexandria, Virginia.
3. The defendants are calling Larry Carver as their witness in their case in chief.
4. Because of the time and expense that will be incurred in attending Mr. Carver’s deposition, the plaintiff brings this motion to limit the issues to be addressed by the defendants with Mr. Carver, in conformance with the defendants’ disclosures under Supreme Court Rule 213(f).
5. In their 213(f) disclosures regarding Mr. Carver, the defendants state:  
  
Mr. Carver, a former employee who is subject to the attorney-client privilege, will testify regarding Plaintiff’s termination. Further, Mr. Carver will testify regarding Plaintiff’s defamatory and commercially disparaging statements as to Ms.

Wolford, Mr. Slater and CSSS. Mr. Carver's last known address is 6208 Waterlily Court, Alexandria, VA 22310.

A copy of the defendants' 213(f) disclosures is attached as Exhibit 2.

6. After the time of these disclosures the defendants dismissed their counterclaims against the plaintiff. Therefore, any testimony regarding plaintiff's alleged defamatory and commercially disparaging statements as to Ms. Wolford, Mr. Slater and CSSS is irrelevant and immaterial.

7. The plaintiff is also concerned because the defendants have indicated that they intend to question Mr. Carver about a number of irrelevant and immaterial matters, such as his romantic relationships, the financial viability of his past and present business enterprises, whether Mr. Carver or his business have ever been sued, whether Mr. Carver or his businesses have ever had any trouble with the IRS, and other such improper matters.

8. The plaintiff's concerns are not without a basis or foundation. Mr. Carver gave an evidence deposition on July 31, 2009. At the evidence deposition the defendants questioned Mr. Carver as follows:

- Q. You mentioned earlier that you were in a relationship with Ms. Wolford. Was it a monogamous relationship? (Page 146, Line 21).
- Q. Do you know who Denise Holland is? Did you have an affair with her? (Page 147, Line 19).
- Q. Do you know a Linda Hightower? (Page 148, Line 7).
- Q. Do you recall whether you've ever been sued for pirating Microsoft information or software? (Page 149, Line 8).
- Q. Do you have any sort of IRS liens or anything like that? (Page 150, Line 17).
- Q. Do you know a woman named Helen Pavlowkis? (Page 152, Line 3).
- Q. How many businesses have you had? (Page 153, Line 18).

9. All of the above questions are improper and were asked only for the purpose of harassing and intimidating the witness.

**WHEREFORE**, plaintiff prays that this Honorable Court to limit the deposition of Larry Carver to the only issue disclosed in defendants' 213(f) disclosures, namely, "Mr. Carver, a former employee who is subject to the attorney-client privilege, will testify regarding Plaintiff's termination."

**CHRISTOPHER S. CYNOWA**

/s/ Peter V. Bustamante

By: \_\_\_\_\_  
Peter V. Bustamante

Theresa V. Johnson  
200 East Chicago Avenue  
Suite 200  
Westmont, Illinois 60559  
(630) 321-1330  
Attorney No. 37363

Peter V. Bustamante  
150 North Michigan Avenue  
Suite 690  
Chicago, Illinois 60601  
(312) 346-2072  
Attorney No. 70292

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

CHRISTOPHER S. CYNOWA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 08 L 403
	)	
CSSS, INC., et al	)	
	)	
Defendants.	)	

**NOTICE OF EVIDENCE DEPOSITION**

PLEASE TAKE NOTICE that on Tuesday, March 29, 2011, at 1:00 p.m. EST, Defendants shall take the evidence deposition of Larry Carver at Puckett & Faraj, P.C., 1800 Diagonal Road, Suite 210, Alexandria, Virginia 22314, at which time you may appear and examine the witness if you so desire. This evidence deposition will continue day-to-day until complete.

By: /s/ John E. Murray  
One of their attorneys

Kevin B. Duff  
John E. Murray  
RACHLIS DURHAM DUFF & ADLER, LLC  
542 S. Dearborn Street, Suite 900  
Chicago, IL 60605  
(312) 733-3950 (office)  
(312) 733-3952 (facsimile)

**CERTIFICATE OF SERVICE**

I, John E. Murray, hereby certify that on Saturday, March 19, 2011, I caused a true and correct copy of the foregoing **Notice of Evidence Deposition**, to be served upon counsel for Plaintiff listed below via electronic delivery:

Theresa V. Johnson  
Law Offices of Theresa V. Johnson  
200 E. Chicago Avenue, Suite 200  
Westmont, IL 60559  
Fax: (630) 321-1185  
theresavjohnson@prodigy.net

Peter V. Bustamante  
150 North Michigan Avenue, Suite 690  
Chicago, IL 60601  
(312) 346-2072  
pvbust@bustamantelaw.com

By: /s/ John E. Murray

John E. Murray  
RACHLIS DURHAM DUFF & ADLER, LLC  
542 South Dearborn, Suite 900  
Chicago, IL 60605  
Office: (312) 733-3950  
Facsimile: (312) 733-3952

CM 2011-71

This SUBPOENA/SUBPOENA DUCES TECUM TO PERSON UNDER FOREIGN SUBPOENA is being served by a private process server who must provide proof of service in accordance with Va. Code § 8.01-325.

**TO the person authorized to serve this process:** Upon execution, the return of this process shall be made to the Clerk of Court.

NAME: <u>Larry Carver</u>	
ADDRESS: <u>6208 Waterlily Court, Alexandria VA 22310</u>	
<input checked="" type="checkbox"/> PERSONAL SERVICE	Tel. No. _____
Being unable to make personal service, a copy was delivered in the following manner:	
<input type="checkbox"/> Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purport. List name, age of recipient, and relation of recipient to party named above: _____ _____	
<input type="checkbox"/> Posted on front door or such other door as appears to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.)	
<input type="checkbox"/> not found	_____, Sheriff
<u>3/19/2011</u> DATE	by <u>KENNETH F. NICHOLSON</u> , Deputy Sheriff

**SUBPOENA/SUBPOENA DUCES TECUM  
TO PERSON UNDER FOREIGN SUBPOENA**

File No. CM 2011-71

Commonwealth of Virginia VA CODE §§ 8.01-412.8—8.01-412.15; Rule 4:9

Fairfax ..... Circuit Court

4110 Chain Bridge Road, Fairfax, VA 22030

ADDRESS OF COURT

Christopher S. Cynowa ..... *v./In re:* CSSS.NET, Inc., et al.

**TO THE PERSON AUTHORIZED BY LAW TO SERVE THIS PROCESS:**

You are commanded to summon

Larry Carver

NAME

6208 Waterlily Court

STREET ADDRESS

Alexandria, VA 22310

CITY

STATE

ZIP

**TO THE PERSON SUMMONED:** You are commanded to

attend and give testimony at a deposition

produce the books, documents, records, electronically stored information, and tangible things designated and described below

.....  
.....  
.....

at Puckett & Faraj, 1800 Diagonal Rd #210, Alexandria, VA 22314 at March 29, 2011 at 1:00 ;  
LOCATION DATE AND TIME

and to permit inspection and copying by the requesting party or someone acting in his or her behalf of the designated items in your possession, custody or control

permit inspection of the premises

at the following location

.....  
LOCATION

on .....  
DATE AND TIME

This subpoena is issued upon the request of the party named below

The Law Firm of Puckett & Faraj, PC

NAME OF REQUESTING PARTY

1800 Diagonal Road, Suite 210

STREET ADDRESS

Alexandria

VA

22314

703-706-9566

CITY

STATE

ZIP

TELEPHONE NUMBER



CM 2011-71

The requesting party has submitted to this Clerk's Office the foreign subpoena, copy attached, the terms of which are incorporated herein, and the written statement required by Virginia Code § 8.01-412.10.

The names, addresses and telephone numbers of all counsel of record in the proceeding to which the subpoena relates and of parties not represented by counsel are provided  below  on attached list.

March 16, 2011

DATE ISSUED

JOHNT. FREY, CLERK

by Raura Link  
CLERK  
DEPUTY CLERK

Haytham Faraj  
NAME OF ATTORNEY FOR REQUESTING PARTY  
1800 Diagonal Road, Suite 210  
OFFICE ADDRESS  
Alexandria, VA 22314  
OFFICE ADDRESS

6286135 IL  
BAR NUMBER LICENSING STATE  
(703) 706-9566  
TELEPHONE NUMBER OF ATTORNEY  
(202) 318-7652  
FACSIMILE NUMBER OF ATTORNEY

John E. Murray  
NAME  
542 S. Dearborn Street, Suite 900  
STREET ADDRESS  
Chicago, IL 60605  
STREET ADDRESS

40151 IL  
BAR NUMBER LICENSING STATE  
(312) 733-3950  
TELEPHONE NUMBER  
FACSIMILE NUMBER

Neal A. Puckett  
NAME  
1800 Diagonal Road, Suite 210  
STREET ADDRESS  
Alexandria, VA 22314  
STREET ADDRESS

44699 VA  
BAR NUMBER LICENSING STATE  
(703) 706-9566  
TELEPHONE NUMBER  
(202) 318-7652  
FACSIMILE NUMBER

NAME  
STREET ADDRESS  
STREET ADDRESS

BAR NUMBER LICENSING STATE  
TELEPHONE NUMBER  
FACSIMILE NUMBER

RETURN OF SERVICE (see page three of this form)

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

Christopher S. Cynowa

Plaintiff/Petitioner

v.

CSSS.NET, Inc., et al.

Defendant/Respondent

No. 08-L-403

CM 2011-71

SUBPOENA IN A CIVIL MATTER (For Testimony and/or Documents)

To: Larry Carver
6208 Waterlily Court
Alexandria, VA 22310

- 1. YOU ARE COMMANDED to appear to give your testimony before the Honorable...
2. YOU ARE COMMANDED to appear and give your deposition testimony before a Notary Public at: Puckett & Faraj, 1800 Diagonal Road... Evidence
3. YOU ARE COMMANDED to mail the following documents in your possession or control to...

Description continued on attached page(s). YOUR FAILURE TO RESPOND TO THIS SUBPOENA WILL SUBJECT YOU TO PUNISHMENT FOR CONTEMPT OF THIS COURT.

Notice to Deponent: I. The deponent is a public or private corporation, partnership, association, or governmental agency. The matter(s) on which examination is requested are as follows:

Description continued on attached page(s). (A nonparty organization has a duty to designate one or more officers, directors, or managing agents, or other persons to testify on its behalf, and may set forth, for each person designated, the matters on which that person will testify. Ill. Sup. Ct. Rule 206.)

- 2. The deponent's testimony will be recorded by use of an audio-visual recording device, operated by...
3. No discovery deposition of any party or witnesses shall exceed three hours regardless of the number of parties involved in the case, except by stipulation of the parties or by order upon showing that good cause warrants a lengthier examination. Ill. Sup. Ct. Rule 206(d).

Atty. No. 40151 Pro Se-99500
Name: John E. Murray
Atty. for: Defendants
Address: 542 South Dearborn Street, Suite 900
City/State/Zip: Chicago, IL 60605
Telephone: (312) 733-3950

Issued by: John Murray Signature

- Attorney
Clerk of Court

Date: 3/11/2011 (March 11), 2011

- I served this subpoena by mailing a copy, as required by Ill. Sup. Ct. Rules 11, 12 and 204(a)(2), to...
I paid the witness \$... for witness and mileage fees.
I served this subpoena by handing a copy to... on...
I paid the witness \$... for witness and mileage fees.

(Signature of Server)

(Print Name)

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

Neal A. Puckett, Esq.  
Lic: VA

Haytham Faraj, Esq.  
Lic: IL, MI, DC



Eric S. Montalvo, Esq.  
Lic: NJ, PA, DC

Debra A. D'Agostino, Esq.  
Lic: NY

THE LAW FIRM OF PUCKETT AND FARAJ, PC

March 14, 2011

Fairfax Circuit Courthouse  
Clerk of Court  
4110 Chain Bridge Rd.  
Fairfax, VA 22030

CM 2011-71

FILED  
CIVIL INTAKE  
2011 MAR 14 PM 12:35  
JOHN T. FREY  
CLERK, CIRCUIT COURT  
FAIRFAX, VA

To the Clerk of the Court:

A lawsuit is pending in the Circuit Court of Cook County, Illinois, captioned *Cynowa v. CSSS.NET, Inc. et al.*, No. 08-L-403.

Defendants have issued a subpoena from the Circuit Court of Cook County, Illinois, requesting to take the evidence deposition of Larry Carver. (Attached hereto.) The subpoena to Larry Carver requires that Carver appear for evidence deposition on March 29, 2011, beginning at 1:00 p.m. EST, at 1800 Diagonal Road, Suite 210, Alexandria, Virginia 22314.

Defendants request that the Clerk of Court issue a Virginia subpoena in conformance with the Illinois subpoena.

Upon petition, the State of Illinois issues subpoenas that incorporate the terms of out-of-state subpoenas. Illinois Supreme Court Rule 204(b) highlights the procedures for obtaining a subpoena to compel the appearance of an Illinois deponent for deposition for an action pending in another State. As such, Illinois law grants reciprocal privileges to citizens of the Commonwealth of Virginia for taking of discovery in the State of Illinois.

Therefore, in compliance with VA Code. § 8.01-412.10, Defendants respectfully request that the Clerk of Court promptly issue a Virginia subpoena for the evidence deposition for Larry Carver for service upon him.

Neal A. Puckett  
(Member – Virginia Bar 44699)

Very truly yours,

Haytham Faraj  
(Member – Illinois Bar 6286135)

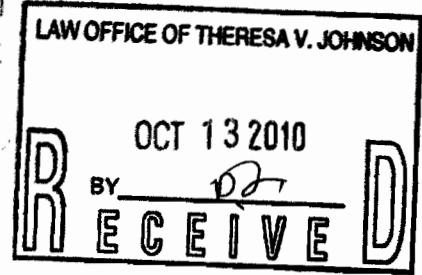
  
Haytham Faraj, Esq.

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

19 OCT -8 PM 3:31

CHRISTOPHER S. CYNOWA, )  
)  
Plaintiff, )  
)  
v. )  
)  
CSSS, INC., et al. )  
)  
Defendants. )

No. 08 L 403  
Calendar C  
Hon. Ronald S. Davis



**DEFENDANTS' RULE 213(f)(1) DISCLOSURES**

NOW COME Defendants CSSS, Inc., Lisa Wolford, and William F. Slater, ("Defendants"), through their undersigned counsel, and for their Supreme Court Rule 213(f)(1) Disclosures state as follows:

Subject to and without waiving the objections that the Defendants previously set forth in response to Plaintiff's interrogatories, which are incorporated herein by reference as though fully set forth herein, Defendants disclose the following persons as 213(f)(1) witnesses or as otherwise noted:

**Robert Adrowski, VA Hines Facility Police Officer**

Officer Adrowski will testify regarding Plaintiff's termination and the VA police report prepared on the date of the termination. Mr. Adrowski's address is unknown but he is believed to reside in the Chicagoland area.

**Larry Carver**

Mr. Carver, a former employee who is subject to the attorney-client privilege, will testify regarding Plaintiff's termination. Further, Mr. Carver will testify regarding Plaintiff's defamatory and commercially disparaging statements as to Ms. Wolford, Mr. Slater and CSSS. Mr. Carver's last known address is 6208 Waterlily Court, Alexandria, VA 22310.

**Michael Cronin**

Mr. Cronin will testify regarding Plaintiff's behavior, characteristics, conduct, and alleged damages. On information and belief, Mr. Cronin should be contacted through Robert Vega, Staff Attorney, Chicago Office of Regional Counsel, Department of Veterans Affairs, P.O. Box 1427, Hines, IL 60141.

**Custodian of Records and Representatives for the VA and VA Hines Facility**

These witnesses will testify regarding the maintenance records pertaining to the Plaintiff. These witnesses will also testify regarding Hines VA policies, practices and procedures. These witnesses should be contacted through Robert Vega, Staff Attorney, Chicago Office of Regional Counsel, Department of Veterans Affairs, P.O. Box 1427, Hines, IL 60141.

**Carolyn Cynowa**

Ms. Cynowa will testify regarding Plaintiff's alleged damages, conduct, behavior and characteristics and her personal dealings with Plaintiff. Ms. Cynowa's last known address is 990 Manchester Court, Apt. 5, South Elgin, IL 60177-1455.

**Christopher Cynowa, Plaintiff**

It is expected that Plaintiff will testify as to Plaintiff's Complaint and to Defendant's Counterclaim, along with his deposition testimony, interrogatory answers and any 213(f)(1) disclosures prepared on his behalf. Plaintiff's address is 1100 Pine Street, Fox River Grove, IL 60024.

**Linda Dunlap**

Ms. Dunlap will testify as an (f)(1) and/or (f)(2) witness regarding: VA security access practices, policies, and procedures; Plaintiff's damages, security access, public trust eligibility, and background investigation; the VA's personnel suitability and security program, investigative process, position risk levels and suitability determinations; and notices regarding plaintiff to the Hines VA human resources manager and VA security and investigations center. Defendants expect

to elicit opinions with respect to the foregoing, including but not limited to Plaintiff's alleged damages or lack thereof with respect to security access, security status, and opportunities for government employment in relation to security access. Ms. Dunlap should be contacted through Robert Vega, Staff Attorney, Chicago Office of Regional Counsel, Department of Veterans Affairs, P.O. Box 1427, Hines, IL 60141.

**Tushar Engreji**

Mr. Engreji will testify regarding communications with Plaintiff and other people at the Hines VA surrounding Plaintiff's termination and regarding Plaintiff's behavior, characteristics, conduct, and alleged damages. On information and belief, Mr. Engreji should be contacted through Robert Vega, Staff Attorney, Chicago Office of Regional Counsel, Department of Veterans Affairs, P.O. Box 1427, Hines, IL 60141.

**McIntosh Ewell**

Mr. Ewell will testify regarding Plaintiff's termination. Further, Mr. Ewell will testify regarding Plaintiff's defamatory and commercially disparaging statements as to Ms. Wolford, Mr. Slater and CSSS and the damages that have been suffered. Mr. Ewell may be contacted at 10315 Grandhaven Avenue, Upper Marlboro, MD 20772.

**Noel Flanagan**

Mr. Flanagan will testify regarding Plaintiff's behavior, characteristics, and conduct and regarding communications with and about Plaintiff. On information and belief, Mr. Flanagan should be contacted through Robert Vega, Staff Attorney, Chicago Office of Regional Counsel, Department of Veterans Affairs, P.O. Box 1427, Hines, IL 60141.

**Kim Griffin**

Ms. Griffin will testify regarding Plaintiff's termination and Plaintiff's behavior, characteristics, and conduct. On information and belief, Ms. Griffin should be contacted through

Robert Vega, Staff Attorney, Chicago Office of Regional Counsel, Department of Veterans Affairs, P.O. Box 1427, Hines, IL 60141.

**Yong Kim**

Mr. Kim will testify regarding Plaintiff's alleged damages, including but not limited to federal government employment opportunities. Mr. Kim can be contacted through Defendants' counsel.

**Bunty Kothari**

Mr. will testify regarding Plaintiff's claims, his behavior, characteristics, conduct and alleged damages and regarding the circumstances of Plaintiff's termination and regarding communications with and about Plaintiff. Mr. Kothari may also testify regarding Plaintiff's defamatory and commercially disparaging statements as to Ms. Wolford, Mr. Slater and CSSS and the damages that have been suffered. Mr. Kothari should be contacted through Robert Vega, Staff Attorney, Chicago Office of Regional Counsel, Department of Veterans Affairs, P.O. Box 1427, Hines, IL 60141.

**Gary Knippel, VA Hines Facility Employee**

Mr. Knippel will testify regarding Plaintiff's termination and the VA police report on the date of the termination. On information and belief, Mr. Knippel should be contacted through Robert Vega, Staff Attorney, Chicago Office of Regional Counsel, Department of Veterans Affairs, P.O. Box 1427, Hines, IL 60141.

**Deborah Lawson**

Ms. Lawson will testify regarding Plaintiff's claims, his behavior, characteristics, conduct and alleged damages. On information and belief, Ms. Lawson's last known address is 1018 Gloucester HB, Schaumburg, IL 60193.

**Maria L. Milan**

Ms. Milan will testify regarding Plaintiff's claims, his behavior, characteristics, conduct and alleged damages and regarding the circumstances of Plaintiff's termination and regarding communications with and about Plaintiff. Ms. Milan's last known address is 1111 South Harlem Avenue, Forest Park, IL 60130.

**Diana Nary**

Ms. Nary will testify regarding Plaintiff's claims, his behavior, characteristics, conduct and alleged damages. Ms. Nary will also testify as an (f)(1) and/or (f)(3) witness regarding: Plaintiff's security access, CSSS and VA security access practices, policies, and procedures; Plaintiff's damages, security access, public trust eligibility, and background investigation; the VA's personnel suitability and security program, investigative process, position risk levels and suitability determinations; and notices regarding plaintiff to the Hines VA human resources manager and VA security and investigations center. Defendants expect to elicit opinions with respect to the foregoing, including but not limited to Plaintiff's alleged damages or lack thereof with respect to security access, security status, and opportunities for government employment in relation to security access. Ms. Nary can be contacted through Defendants' counsel.

**Michael Nikiforos**

Mr. Nikiforos will testify regarding communications with and about Plaintiff surrounding his termination and regarding Plaintiff's behavior, characteristics, conduct, and alleged damages. On information and belief, Mr. Nikiforos's last known address is 4638 North Hamlin Avenue, Chicago, IL 60625.

**Randy Padal**

Mr. Padal will testify regarding communications with and about Plaintiff surrounding his termination and regarding Plaintiff's behavior, characteristics, conduct, and alleged damages. On information and belief, Mr. Padal should be contacted through Robert Vega, Staff Attorney,



Chicago Office of Regional Counsel, Department of Veterans Affairs, P.O. Box 1427, Hines, IL 60141.

**William Slater, III**

Mr. Slater will testify as to Plaintiff's Complaint, as amended, and to Defendant's Counterclaim, along with the interrogatory answers and any 213(f)(1) disclosures prepared on his behalf. Mr. Slater will also testify regarding Plaintiff's termination. Further, Mr. Slater will testify regarding Plaintiff's defamatory and commercially disparaging statements as to him, Ms. Wolford and CSSS and the damages that have been suffered by him, Ms. Wolford and CSSS. Mr. Slater may be contacted through Defendants' counsel.

**Anthony Slatton**

Mr. Slatton will testify regarding Plaintiff's termination. Further, Mr. Slatton will testify regarding Plaintiff's defamatory and commercially disparaging statements as to Ms. Wolford, Mr. Slater and CSSS and the damages that have been suffered. Mr. Slatton will also testify as to allegedly defamatory statements attributed to the Defendants. Mr. Slatton may be contacted through Defendants' counsel.

**Scott Theobald**

Mr. Theobald will testify regarding Plaintiff's termination. Further, Mr. Theobald will testify regarding Plaintiff's defamatory and commercially disparaging statements as to Ms. Wolford, Mr. Slater and CSSS and the damages that have been suffered. Mr. Theobald will also testify as to matters germane to CSSS human resources of employment issues. Mr. Theobald may be contacted through Defendants' counsel.

**Lisa Wolford**

Ms. Wolford will testify as to Plaintiff's Complaint and to Defendant's Counterclaim, along with the interrogatory answers and any 213(f)(1) disclosures prepared on her behalf. Ms. Wolford will also testify regarding Plaintiff's termination. Further, Ms. Wolford will testify

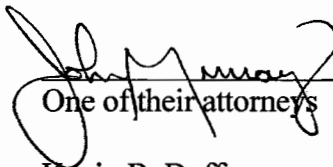
regarding Plaintiff's defamatory and commercially disparaging statements as to her and CSSS and the damages suffered. Ms. Wolford will also testify as to those matters raised in her deposition and the depositions of other people taken in this case. Ms. Wolford may be contacted through Defendants' counsel.

Defendants also adopt herein by reference and reserve the right to call any individual named in any of Plaintiff's Rule 213(f) disclosures at trial. In addition to the topics detailed herein *supra*, these witnesses may be called to testify to the alleged facts and circumstances in the Plaintiff's Verified Amended Complaint and the facts and circumstances in Defendants' Answer, affirmative defenses, counterclaims, the interrogatory answers prepared on behalf of the Defendants and Plaintiff in this lawsuit, any 213(f)(1) disclosures prepared on behalf of the Defendants and Plaintiff in this lawsuit, and any deposition testimony in this lawsuit. Investigation continues.

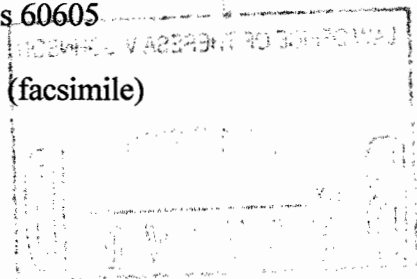
CSSS, INC., LISA WOLFORD,  
and WILLIAM F. SLATER

Dated: October 8, 2010

By:

  
One of their attorneys

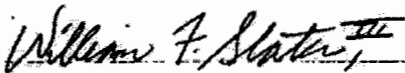
Kevin B. Duff  
John E. Murray  
Rachlis Durham Duff & Adler, LLC  
542 South Dearborn, Suite 900  
Chicago, Illinois 60605  
(312) 733-3950  
(312) 733-3952 (facsimile)

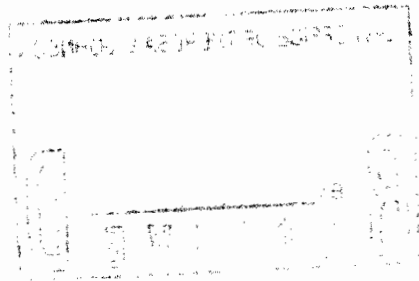


**VERIFICATION**

Under penalties as provided by law pursuant to Section 1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters stated to be on information and belief, as to such matters, the undersigned certifies as aforesaid that he verily believes the same to be true.

Dated: October 7, 2010

By:   
WILLIAM F. SLATER, III

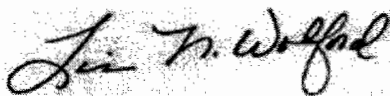


**VERIFICATION**

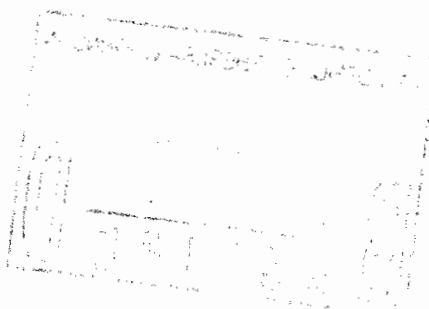
Under penalties as provided by law pursuant to Section 1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters stated to be on information and belief, as to such matters, the undersigned certifies as aforesaid that she verily believes the same to be true.

Dated: 8 October 2010

By:



CLIENT/SERVER SOFTWARE  
SOLUTIONS, INC. by its President,  
LISA N. WOLFORD



**VERIFICATION**

Under penalties as provided by law pursuant to Section 1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters stated to be on information and belief, as to such matters, the undersigned certifies as aforesaid that she verily believes the same to be true.

Dated: 8 October 2010

By:



LISA N. WOLFORD

