

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

FILED TO 10 13 02

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

No. 08 L 403

**DEFENDANTS' SECOND SUPPLEMENTAL RESPONSE
TO PLAINTIFF'S FIRST SET OF INTERROGATORIES**

Pursuant to Illinois Supreme Court Rule 213, Defendants CSSS, Inc., Lisa Wolford, and William F. Slater, ("Defendants"), through their undersigned counsel, further supplement their answers to Plaintiff's First Set of Interrogatories as follows:

ANSWERS TO INTERROGATORIES

14. Please identify all witnesses and other information called for pursuant to Illinois Supreme Court Rule 213(f)(1) through (f)(3).

Linda Dunlap

Ms. Dunlap will testify as an (f)(1) and/or (f)(3) 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. Plaintiff's Public Trust eligibility dated 07/12/2006 based on the Moderate Background Investigation completed in 06/30/2006, remained good until he had a 24-month break in service. Plaintiff could have applied for another job/position he qualified

for within the VA or another agency requiring a Low or Moderate Background investigation from January 2007 and January 2009 without prejudice. The VA did not receive a request to suspend or revoke Plaintiff's Public Trust eligibility.

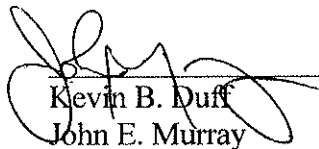
Diana Nary

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)(2) 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. Plaintiff's Public Trust eligibility dated 07/12/2006 based on the Moderate Background Investigation completed in 06/30/2006, remained good until he had a 24-month break in service. Plaintiff could have applied for another job/position he qualified for within the VA or another agency requiring a Low or Moderate Background investigation from January 2007 and January 2009 without prejudice. The VA did not receive a request to suspend or revoke Plaintiff's Public Trust eligibility.

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

Dated: December 16, 2010

By:



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 (fax)

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.

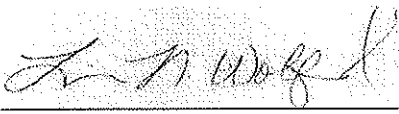
Dated: _December 16, 2010

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.

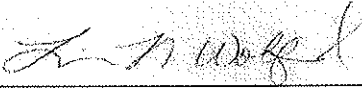
Dated: 12/16/10

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: 12/16/10

By: 
LISA N. WOLFORD