

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



John Gilbody, Raphael Zilch, Erik Hohler, )  
Rommy Henley, Sean Bernhardt, Kim )  
Mitchell, Edward Storozak, John Darby, )  
Henry Zumbrun, Dan Gossett and )  
Brian Sherman, )

Plaintiffs,

vs.

John A. Popadiuk, indiv. and d/b/a )  
Zidware, Inc., Michelle Popadiuk, indiv. )  
and d/b/a Zidware, Inc., and Zidware, Inc., )  
an Illinois Corporation, )

Defendants.

24702

Case No.: 15 M1 110181

Transferred to Law

FILED  
2017 JAN 17 PM 1:15  
CLERK OF CIRCUIT COURT  
LAW DIVISION

3331  
2871  
3081  
3366  
3327

**NOTICE OF FILING AND CERTIFICATE OF SERVICE**

To: Zane D. Smith & Associates, Ltd.  
415 N. LaSalle, Ste. 501  
Chicago, IL 60654

Please take notice that on JAN. 17, 2017 I caused to be filed with the Clerk of the Circuit Court of Cook County, Illinois, the attached documents.

I, Bryan G. Thompson, an attorney, certify that I caused this notice and the attached pleading(s) to be served upon the above named entity by depositing true copies of same with proper postage prepaid in the U.S. Mail depository at 77 W. Washington, Ste. 702 Chicago, IL, at 5:00 p.m. on 1/17/17.

Bryan G. Thompson  
Attorney for Defendant

Law Offices of Arnold H. Landis, P.C. (24702)  
77 W. Washington, Ste. 702  
Chicago, Illinois 60602  
(312) 236-6268

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**DEFENDANTS' FIRST SET OF  
INTERROGATORIES TO PLAINTIFF**

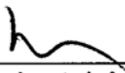
The undersigned Defendants, by and through its attorneys, Law Offices of Arnold H. Landis P.C., pursuant to Supreme Court Rule 213 and the Illinois Code of Civil Procedure, propounds the following Interrogatories to be answered by Plaintiff under oath, within 28 days after service of these Interrogatories, or such earlier date as provided by Order of Court entered in these proceedings.

1. Pursuant to Illinois Supreme Court Rule 213(f)(1), identify each lay witness who may testify at trial and identify the subject matters on which each witness will testify.

2. Pursuant to Illinois Supreme Court Rule 213(f)(2), identify each independent expert witness who may testify at trial and identify the subject matters on which each witness may testify and the opinions you expect to elicit from each witness, the conclusions and opinions of each witness and the basis therefore, the qualifications

of each witness, including a *curriculum vitae* and/or resume, if any, and any reports prepared by or at the direction of each witness about the case.

3. Pursuant to Illinois Supreme Court Rule 213(f)(3), identify each controlled expert witness who may testify at trial and identify the subject matters on which each witness will testify and the opinions you expect to elicit from each witness, the conclusions and opinions of each witness and the bases therefore, the qualifications of the witness, including a *curriculum vitae* and/or resume, if any, and any reports prepared by or at the direction of each witness about the case.

By:  \_\_\_\_\_  
Defendants' Attorney

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**REQUEST FOR PRODUCTION OF DOCUMENTS, OBJECTS AND TANGIBLE THINGS PURSUANT TO SUPREME COURT RULE 214 TO EACH PLAINTIFF**

Pursuant to Rule 214 of the Illinois Supreme Court, the undersigned hereby demands that the following documents, objects or tangible things be produced by each Plaintiff at Law Office of Arnold H. Landis, P.C., 77 W. Washington, Ste. 702, Chicago, IL within 28 days for inspection and copying. Each Plaintiff is hereby requested to produce the following.

- A. All correspondence pertaining to the subject matter of this lawsuit.
- B. All memoranda, notes, or writings pertaining to this lawsuit.
- C. All photographs, surveys, films, drawings, recordings, or other writings pertaining to this lawsuit.
- D. All bills, receipts, invoices, purchase orders, computer print-outs, delivery receipts, cancelled checks, ledgers reports, diaries, or other documents, objects, or tangible things pertaining to the subject matter of this lawsuit.
- E. All statements or interviews, whether written, tape-recorded or otherwise preserved, from all persons and as to all matters which pertain to this lawsuit.
- F. All trial exhibits.

Law Office of Arnold H. Landis, P.C.  
77 W. Washington, Ste. 702  
Chicago, Illinois 60602  
(312) 236-6268

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Arnold H. Landis  
Attorney for Defendants

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

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2017 JAN 17 PM 1:14  
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**NOTICE OF DEPOSITION**

To: Zane D. Smith & Associates, Ltd.  
415 N. LaSalle, Ste. 501  
Chicago, IL 60654

Please take notice that we will take the discovery depositions of the listed deponents, pursuant to Illinois Supreme Court Rule 206(a)(1) at the time and date noted.

DEPONENT	DATE	TIME
JOHN GILBODY	February 10, 2017	9:00a.m
RAPHAEL ZILCH	February 10, 2017	10:00a.m
ERIK HOHLER	February 10, 2017	11:00a.m
ROMMY HENLEY	February 10, 2017	12:00p.m
SEAN BARHNARDT	February 10, 2017	1:00p.m
KIM MITCHELL	February 10, 2017	2:00p.m
EDWARD STOROZIK	February 10, 2017	3:00p.m
JOHN DARBY	February 10, 2017	4:00p.m
HENRY SUMBRUN	February 13, 2017	9:00a.m.
DAN GOSSETT	February 13, 2017	10:00a.m.
BRIAN SHERMAN	February 13, 2017	11:00a.m.
JOE NEWHART	February 13, 2017	12:00p.m.

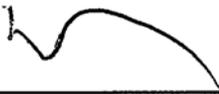
CHRISTOPHER WRIGHT	February 13, 2017	1:00p.m.
MICHAEL ENGEL	February 13, 2017	2:00p.m.
GAVIN WONG	February 13, 2017	3:00p.m.
ALIAN MUELLER	February 13, 2017	4:00p.m.
RICHARD STUHLSTZ	February 17, 2017	9:00a.m.
STEPHAN MULLER	February 17, 2017	10:00a.m.
MARK WILLIAMS, JR.	February 17, 2017	11:00a.m.
RONALD BARBAGALLO	February 17, 2017	12:00p.m.
TREVOR GRAW	February 17, 2017	1:00p.m.
JUSTIN KELLY	February 13, 2017	2:00p.m.

Before a notary public, or other officer authorized to administer oaths, at Suite 702, 77 W. Washington, Chicago, IL, (312) 236-6268, in the above titled cause, pursuant to applicable statutes and rules of court. The above deposition/s will be taken for the purpose/s of discovery.

You are further notified pursuant to the Code of Civil Procedure and Rules of the Supreme Court of Illinois that you are by this Notice required to have present at that date, time and place stated above, the said deponent for oral examination and for the purpose of discovery.

You are further required to produce the following documents at the deposition:  
Documents produced in discovery.

I certify that I served the foregoing Notice of Deposition upon the party identified above via fax and/or e-mail and by depositing true copies of same with proper postage prepaid in the U.S. Mail depository at 77 W. Washington, Chicago, Illinois, at 5:00 p.m. on 1/17/17.

  
\_\_\_\_\_  
Arnold H. Landis

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