

STATE OF ILLINOIS
DEPARTMENT OF TRANSPORTATION

DEPT OF
TRANSPORTATION
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OFFICE OF
CHIEF COUNSEL
SPRINGFIELD, IL
62734

In re the matter of the Proposed Children's Memorial)
Hospital Rooftop Heliport to be located in Chicago,)
Cook County, Illinois)

NOTICE OF DISCOVERY DEPOSITION

On June 30, 2009, at 11:00 a.m. (CST), at Rowan Williams Davies & Irwin Inc., 650 Woodlawn Rd. W., Guelph, Ontario, Canada N1K 1B8, the deposition of Meiring Beyers will be taken before a notary public (McCorkle Reporting/Nimigan – Mihailovich – 312-263-0052/905-522-1653) on oral interrogatories for discovery in this case, and at that time the deponent shall produce all the documents requested on the attached rider.

Dated: June 18, 2009

Respectfully submitted,

Streeterville Organization of Active Residents

BY: HINSHAW & CULBERTSON LLP

BY: 

Richard S. Porter
One of Its Attorneys

Richard S. Porter
HINSHAW & CULBERTSON LLP
100 Park Avenue
P.O. Box 1389
Rockford, IL 61105-1389
815-490-4900

DEPOSITION PRODUCTION RIDER

DEPOSITION OF MEIRING BEYERS

The deponent is commanded to produce at the discovery deposition in this case, the following documents:

1. All records, documents and other tangible items received by the deponent for review, whether or not in fact reviewed.
2. All other records, documents or other tangible items reviewed or consulted by deponent in connection with the application to site a heliport.
3. The deponent's complete file pertaining to the application to site a heliport.
4. All correspondence or other communications received by deponent relative to the application to site a heliport.
5. All correspondence or other communications generated by the deponent relative to the application to site a heliport.
6. All notes (including notations made on records) relative to the deponent's review and opinions.
7. All literature, standards, guidelines, texts, statute, regulations, rules, policies, procedures, protocols and the like, which deponent (a) has consulted in connection with his/her review, (b) relies upon, or (c) may otherwise use or refer to at the Illinois Department of Transportation hearing.
8. All bills, time records and other billing records pertaining to deponent's activities in the application to site a heliport.
9. All reports, memoranda, summaries or other writing (including drafts) prepared by deponent relative to the application to site a heliport.
10. Deponent's current curriculum vitae.
11. Complete records reflecting deponent's billings and payments received for expert witness activities for the preceding five calendar years, including, but not limited to, review of records, consultation and testimony for any attorney.
12. A list of all cases in which the deponent has participated as a consulting expert or expert witness for Alan Farkas, John Wedge, or their law firms, or Children's Memorial Hospital at any time.
13. A printout of any and all e-mail or other electronic communications between the deponent and Alan Farkas, John Wedge, Children's Memorial Hospital, or anyone acting on their behalf.

The foregoing requests shall include any computer-stored data, which shall be produced in a form that is readable by the participants in the deposition.

AFFIDAVIT OF SERVICE

The undersigned, pursuant to the provisions of Section 1-109 of the Illinois Code of Civil Procedure, hereby under penalty of perjury under the laws of the United States of America, certifies that on June 19, 2009, a copy of the foregoing Notice of Discovery Deposition was served upon:

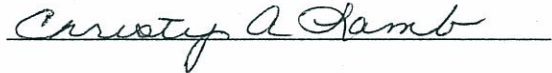
Attorney Alan L. Farkas
Madsen Farkas & Powen, LLC
20 South Clark Street, Suite 1050
Chicago, Illinois 60603

The Children's Memorial Hospital
c/o Attorney Jack George
Daley & George Ltd.
20 S. Clark Street, Suite 400
Chicago, IL 60603-1835

Illinois Department of Transportation
c/o Attorney Ellen Schanzle-Haskins
2300 S. Dirksen Parkway, Suite 311
Springfield, IL 62703

McCorkle Reporting
200 N. LaSalle Street, Suite 300
Chicago, Illinois 60601

By depositing a copy thereof, enclosed in an envelope in the United States Mail at Rockford, Illinois, proper postage prepaid, before the hour of 5:00 P.M., addressed as above.



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