

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
Municipal Department, First District

«PLAINTIFF»,)
)
Plaintiff,)
)
-vs-) NO. «CIRCUITCOURTNO»
)
«DEFENDANT»,)
)
Defendant.)

NOTICE OF DEPOSITION

TO: <<Attorney For Landlord>>
<<Add1LandlordAtty>>
<<Add2LandlordAtty>>
Chicago, IL <<Zip>>

YOU ARE HEREBY NOTIFIED that pursuant to the applicable rules of the Illinois Supreme Court, the deposition of the Plaintiff, Counterdefendant <<Deponent1>> will be taken for the purposes of discovery only on <<Depo1Date>> at <<Depo1Time>> p.m. at the Law Offices of _____, upon oral interrogatories to be propounded to said deponent, before a Notary Public in and for the County of Cook, State of Illinois, at which time and place you are requested to present said deponent.

Deponent is to bring with Deponent any and all:

1. Books, records, correspondence with Defendant or third parties, and any and all other documents related to the premises occupied by Defendant and the purported reason or reasons for plaintiffs filing the within lawsuit against Defendant.
2. All books and records, leases, applications for a lease, contracts, receipts, correspondence or notes of any kind or nature whatsoever that is not protected by the attorney-client relationship, related, directly or indirectly, to the matters alleged in Plaintiff's complaint and Defendant's answer, affirmative defense(s) and counterclaim(s).
3. Any and all records relating to the receipt of rentals and the payment of interest on security deposits of Defendant, Counterplaintiff .
4. Any and all correspondence of any kind or nature whatsoever with the City of Chicago Building Department and any administrative agencies of the City of Chicago in regard thereto.

5. Any and all correspondence with Defendant, Counterplaintiff, during the term of any lease or leases between the parties.
6. Repair estimates, vouchers, cancelled checks, estimates from vendors, vendors= bills and statements and any and all other documents related to the premises in question for the entire time Defendant has been Plaintiff's tenant.
7. The contract for the purchase or other acquisition of the real estate and the sale of the real estate in which the tenant leases an apartment, and any and all amendments and attachments thereto.
8. Any and all escrow agreements, closing statements, assignments of leases, contracts, undertakings or other documents related to the acquisition or purchase or sale of the property in which the tenant occupies an apartment, whether with the mortgage company or mortgage companies who have been involved with mortgages or the financing of the premises in question.
9. Any and all correspondence with any of the mortgage holders as to the building in question.

Dated: <<DATENoticeDepo1

Paul Bernstein,
Attorney for Defendant, Counterplaintiff,

CERTIFICATE OF DELIVERY

Under penalties as provided by law pursuant to 735 ILCS 5/1-109 of the Code of Civil Procedure, the undersigned attorney for Defendant, Counterplaintiff, certify that I caused a copy of the foregoing **NOTICE OF DEPOSITION** to be delivered to the Plaintiff, in open court on <<NoticeDelDate>>, by personally handing it to the Plaintiff, Counterdefendant.

Paul Bernstein, Counsel For Defendant,
Counterplaintiff

Paul Bernstein,
Counsel for Defendant, Counterplaintiff
333 E. Ontario St. – Ste. #2102B
Chicago, IL 60611
(866) 769-2892
Atty. No. 26707

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