

**IN THE CIRCUIT COURT OF THE TWELTH JUDICIAL CIRCUIT
WILL COUNTY, ILLINOIS**

| | | |
|-------------------------------|---|-----------------|
| STOP NORTHPOINT, LLC, et al., |) | |
| |) | |
| Plaintiffs, |) | |
| |) | |
| v. |) | No. 2020 CH 739 |
| |) | |
| CITY OF JOLIET, et al., |) | |
| |) | |
| Defendants. |) | |

NOTICE OF RECORDS DISCOVERY DEPOSITION

| | |
|---|---|
| TO: Sabrina Spano sspano@joliet.gov Christopher Regis cregis@joliet.gov Assistant Corporation Counsel 150 West Jefferson Street Joliet, IL 60432 | Kathy M. Sons ksons@kggllc.com Kavanagh Gramley & Gorbold, LLC 111 North Ottawa Street Joliet, IL 60432 |
|---|---|

YOU ARE HEREBY NOTIFIED that on January 21, 2021 at 10:00 a.m., the undersigned will take, pursuant to the attached subpoena, the Records Discovery Deposition of Martin Shanahan, at 17 North State Street, Suite 1550, Chicago, Illinois. There will be no questioning of the deponent.

STOP NORTHPOINT, LLC, et al.,

s/ Peter V. Bustamante

CERTIFICATE OF SERVICE

The undersigned certifies that the above and foregoing **NOTICE OF RECORDS DISCOVERY DEPOSITION** was served upon the persons to whom directed above, by email on January 10, 2021.

s/ Peter V. Bustamante

Peter V. Bustamante
17 North State Street, Suite 1550
Chicago, Illinois 60602
(312) 346-2072
pvbust@bustamantelaw.com

IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT
WILL COUNTY, ILLINOIS

STOP NORTHPOINT, LLC, et al.,

Plaintiff

vs

CASE NO: 20 CH 739

CITY OF JOLIET, et al.

Defendant

**SUBPOENA FOR PRODUCTION OF SPECIFIED DOCUMENTS,
OBJECTS OR TANGIBLE THINGS
(NOT FOR TRIAL)**

TO: Martin Shanahan

Joliet, IL

You are directed to produce the following documents, objects or tangible things: _____
SEE ATTACHED RIDER.

on the following time and date: January 21, 2021, at 10:00 a.m.

**YOUR FAILURE TO RESPOND TO THIS SUBPOENA OR TO COMPLY WITH COURT
RULES MAY SUBJECT YOU TO PUNISHMENT FOR CONTEMPT OF COURT.**

**YOU MAY COMPLY WITH THIS SUBPOENA BY MAILING LEGIBLE AND COMPLETE
COPIES OF ALL SPECIFIED DOCUMENTS, OBJECTS OR TANGIBLE THINGS REQUESTED IN
THIS SUBPOENA TO THE PARTY OR LAW FIRM WHOSE ADDRESS APPEARS BELOW.
COMPLIANCE BY MAIL REQUIRES A CERTIFICATION THAT THE DOCUMENTS, OBJECTS OR
TANGIBLE THINGS MAILED ARE COMPLETE AND ACCURATE AND CONSTITUTE GOOD FAITH
COMPLIANCE WITH THE MATERIALS REQUESTED BY SAID SUBPOENA. DO NOT FORWARD
MATERIALS BEFORE DATE STATED ON SUBPOENA. DO NOT SEND RECORDS TO COURT OR
CLERK.**

Items to be delivered to the following party or law firm at the following address: Linden & Bustamante, 17 North
State Street, Suite 1550, Chicago, IL 60602

(Seal of Court)

WITNESS _____, 20____

Attorney
(Clerk of the Circuit Court)

Attorney or Party, if not represented by Attorney

Name Richard Linden

ARDC # 6200387

Firm Name Linden & Bustamante

Attorney for Plaintiffs

Address 17 North State Street, Suite 1550

City & Zip Chicago, IL 60602

Telephone 312/590-0211

ANDREA LYNN CHASTEEN, CLERK OF THE CIRCUIT COURT OF WILL COUNTY

RIDER TO SUBPOENA TO MARTIN SHANAHAN

Any and all documents¹ and communications related to NorthPoint Development, LLC, EastGate Logistics Park Chicago, LLC, regarding the annexation of land by Joliet, the development of an industrial park/trucking terminals, and/or the construction of a bridge over Route 53 at Walter Strawn Drive, in Elwood, IL, whether contained in paper or saved electronically in thumb-drives, computer disks, and/or computer hard drives, including but not limited to:

Water studies
Environmental impact studies
Water supply studies
Traffic studies
Noise studies
Vibration studies
Memoranda
Emails
Correspondence
Reports
Notes
Notices
Transcripts

¹ The word "document" or "documents" includes, but is not limited to, the following:

All memoranda, papers, reports, estimates, invoices, photographs, slides, motion pictures, films, video, audio, records, thumb-drives, compact disks, computer diskettes, computer hard drives, charts, graphs, printed or graphic matter of any kind type or description, however produced or reproduced, draft or final, original or reproduction, daily reports, inspection reports, letters and other correspondence, e-mail, telegrams, notices, transcripts, contracts, agreements, memoranda of telephone calls or of telephone conversations, diaries, calendars, books, manuals, logs, press releases, bulletins, statements, trust agreements, contracts, orders, rules, regulations, directives, directions, instructions, interoffice and intra office communications, electronically stored information ("ESI");

Any document which contains any comment, notation, addition, insertion or marking of any kind, that was not part of another version of the same or similar document, is a separate document.