

WK
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KECK P.C.

March 23, 2016

Via Certified Mail

Illinois Department of Public Health
Division of Legal Services
535 West Jefferson Street
Springfield, IL 62761-0001

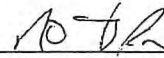
**Re: Douglas J. Wolf, as Executor of the Estate of Anna L. Wolf, Deceased v.
Helia Southbelt Healthcare LLC d/b/a Four Fountains; Case No. 13-L-110**

Dear Sir or Madam:

Enclosed please find a Subpoena Duces Tecum requesting records. Should you have any questions, please do not hesitate to contact me at (618) 257-2222 or by email at nob@weilmuensterlaw.com.

Very truly yours,

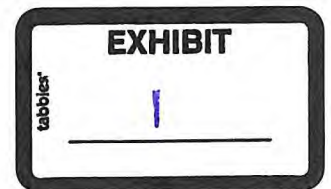
WEILMUNSTER & KECK, P.C.

By: 
Nathaniel O. Brown

NOB/kjf

Enclosure

cc: Daniel W. Farroll



J. MICHAEL WEILMUNSTER
jmw@weilmuensterlaw.com
Licensed in Illinois and Missouri

FREDERICK W. KECK
fwk@weilmuensterlaw.com
Licensed in Illinois and Missouri

J. BRIAN MANION
jbm@weilmuensterlaw.com
Licensed in Illinois and Missouri

NATHANIEL O. BROWN
nob@weilmuensterlaw.com
Licensed in Illinois

THOMAS G. ZURLIENE
tgz@weilmuensterlaw.com
Licensed in Illinois

IN THE CIRCUIT COURT
TWENTIETH JUDICIAL CIRCUIT
ST. CLAIR COUNTY, ILLINOIS

DOUGLAS J. WOLF, as Executor of the)
ESTATE OF ANNA L. WOLF, Deceased,)

Plaintiff,)

v.)

Case No. 13-L-110

HELIA SOUTHBELT HEALTHCARE,)
LLC d/b/a FOUR FOUNTAINS,)

Defendant.)

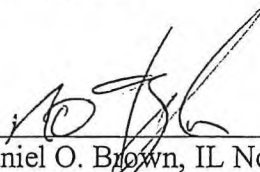
SUBPOENA DUCES TECUM

TO: Illinois Department of Public Health
Division of Legal Services
535 W. Jefferson Street
Springfield, IL 62761-0001

YOU ARE COMMANDED to mail the following documents in your possession or control to Weilmuenster & Keck, P.C. at 3201 West Main Street Belleville, Illinois 62226, on or before 5:00 p.m. on April 23, 2016. (THIS IS FOR RECORDS ONLY. THERE WILL BE NO ORAL INTERROGATORIES.):

Any and all records related to IDPH Incident No. 42609 and/or CMS Investigation Nos. 1141725/IL53209; 1141724/IL53207; and 1141720/IL53203, including the Resident Key, Employee Key, and Other Key in your possession or control.

YOUR FAILURE TO RESPOND TO THIS SUBPOENA WILL SUBJECT YOU TO PUNISHMENT FOR CONTEMPT OF THIS COURT.

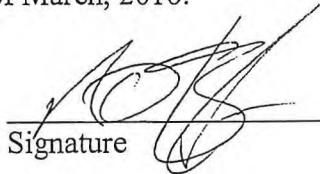


Nathaniel O. Brown, IL No. 06302492
3201 West Main Street
Belleville, Illinois 62226
618-257-2222 / 618-257-2030

Attorney for Plaintiff, Estate of Anna L. Wolf

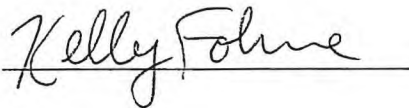
CERTIFICATE OF SERVICE

I served this subpoena by mailing a copy, as required by Ill. Sup. Ct. Rules 11, 12, and 204(a)(2), to the Illinois Department of Public Health Division of Legal Services by certified mail, return receipt requested on the 23rd day of March, 2016.


Signature

Nathaniel O. Brown
Printed Name

Signed and sworn to before me on this 23rd day of April, 2016.



(Notary Public)

J. Brian Manion
Nathaniel O. Brown
Weilmuenster & Keck, P.C.
3201 West Main Street
Belleville, Illinois 62226

