

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

MICHAEL EDWARD HASTINGS

Plaintiff

vs

CASE NO: 2021 D 1097

KATHLEEN MARILYN HASTINGS

Defendant

SUBPOENA FOR DEPOSITION

TO: Lisa Sterba

YOU ARE COMMANDED to appear to give your deposition before a notary public in room no. _____,
at Via Zoom Meeting ID: 876 2184 2322

(Insert name of building, address, city)

on the 22 day of August, 2022, at the hour of 11:00 ☒ a.m. ☐ p.m.

YOU ARE COMMANDED also to bring the following: Please see documents requested on attached Rider.

in your possession or control.

YOUR FAILURE TO APPEAR IN RESPONSE TO THIS SUBPOENA WILL SUBJECT YOU TO
PUNISHMENT FOR CONTEMPT OF THIS COURT.

WITNESS _____, 20____

(Seal of Court)

Ishita (HKS)
(Clerk of the Circuit Court)

I served the subpoena by handing a copy to Global Detective Agency, Ltd. for served upon the named deponent at the
listed address.

August, 2022. I paid the witness \$ 25.00 on the 5 day of _____ for witness and mileage fees.

Signed and sworn to before me

Deborah J. Letamendi
(Notary Public)



(Signature)

Attorney or Party, if not represented by Attorney

Name Ishita Saran

ARDC # 6325846

Firm Name Schiller DuCanto & Fleck LLP

Attorney for Respondent

Address 310 S. County Farm Road, Suite 300

City & Zip Wheaton, Illinois 60187

Telephone (630) 665-5800

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



Original - Court



Copy - Receiving Party

14B (Revised 12/01/2016)

IN RE: THE MARRIAGE OF HASTINGS
Case No. 2021 D 1097

RIDER TO SUBPOENA TO LISA STERBA
(FOR DEPOSITION AND RECORDS)

TO: Lisa Sterba,



DATE: DEPOSITION: August 22, 2022 at 11:00 a.m. (Via Zoom)
DOCUMENTS: August 19, 2022 at 2:00 p.m.

RE: Documents and live testimony relative to Michael Edward Hastings

A. INSTRUCTIONS

1. General Provision. This request for production of documents in the Rider covers all documents, objects or tangible things, in the possession, control, or otherwise available to the deponent, the deponent's agents, employees, his or her attorneys, accountants, consultants or other representatives.

2. Supplementation Required. These requests for production are continuing in nature. Deponent shall seasonably supplement, amend or complete any response to the extent that documents, object or tangible things subsequently come into his or her possession or control or become known to him or her. For example, if Deponent produced bank statements through July 31, 2022, but receives bank statements after July 31, 2022, the new statements must be sent as they are recorded. If Deponent has knowledge of documents, objects or tangible things responsive to this request, either now or in the future, Deponent must disclose such information, whether or not the actual documents, objects, or tangible things are in his or her possession. To the extent that responsive documents, objects or tangible things are not in Deponent's possession, must identify the location of such responsive documents, objects or tangible things in his or her affidavit of compliance as provided for herein.

3. Non-Limiting Language. All requests for production which are stated in the conjunctive are to be read as if stated in the disjunctive and vice-versa (i.e., answer each request as if requiring an and/or response).

4. Copies. Complete and accurate copies will be acceptable compliance with a request for a document, unless the original document is requested. However, original documents must be available for inspection and maintained for trial.

5. Computer Storage. All material responsive to this request stored on computer or other means of data storage must be produced in printed form as well as on disc or CD.

6. Manner of Production. All documents must be produced in the order in which they are kept in the usual course of business or organized and labeled to correspond with categories in the request. The failure to organize the requested documents constitutes a discovery abuse subject to sanctions.

7. Non-Disclosure. With respect to any documents which Deponent withholds or does not disclose that are responsive to this Request, or to the extent that Deponent exerts a claim or privilege of non-disclosure, a statement shall be provided setting forth the statute, rule, decision or other basis which is claimed to give rise to such non-disclosure and such statement(s) shall be supported by a description of the nature of the documents, objects or tangible things not produced.

8. Affidavit of Compliance. Please complete, sign and return the Affidavit of Compliance enclosed with your document production.

9. Authentication by Certification. Please complete, sign and return the Authentication by Certification with your document production. This is an option to attempt to avoid a personal appearance by you at a subsequent court appearance to authenticate your records.

B. DEFINITIONS

Notwithstanding any definition below, each word, term, or phrase used herein is intended to have the broadest meaning permitted under the Illinois Supreme Court Rules. As used herein, the following terms are to be interpreted in accordance with the following definitions:

1. Documents. For the purposes of this rider the term "documents" includes, but is not limited to, any written, printed, typed, recorded, magnetic, digitized, punched, copied, graphic or other tangible thing in, through or from which information or communications may be embodied, translated, conveyed, or stored including, without limitation, all papers, books, records, reports, correspondence, photographs, telegrams, telexes, electronic mail, electronic attachments, memoranda, notes, work papers, worksheets, ledger sheets, invoices, checks, diagrams, graphs, objects, transcripts, minutes, reports, recordings of telephone or other conversations, interviews or conferences, dictation tapes, audio tapes, videotapes, affidavits, statements, summaries, opinions, reports, analyses, notices, charts, drawings, sketches and all of the writings or drafts thereof, publications, calendars, appointment books, diaries, logs, tabulations, computer files, computer tapes (including back up tapes), computer disks (including back up disks), computer printouts, microfiche, microfilm, as well as all data stored in a computer, data stored on removable magnetic or optical media, *e.g.*, magnetic tape, floppy disks and recordable optical disks, data used for electronic data interchange, audit trails, digitized pictures and video, *e.g.*, data stored in MPEG, JPEG and GIF formats, and digitized audio and voicemail, and includes each original and non-duplicative copy of each such document in unaltered format, and all other tangible material.

2. You/Yours. For the purposes of this rider, the term "your" and "yours" includes any item that belongs to you or to any business or entity that employs you or in which you have an ownership or investment interest. For the purposes of this rider, any such items will be deemed to belong to such persons or businesses that has or have any right to, claim against, ownership of, or title to such item, regardless of whether such interest is held individually, jointly, or in some other form of co-ownership, and regardless of whether such interest is vested or contingent, beneficial or legal.

3. Concerning: For the purposes of this request, the terms "concerning" or relating to includes, but is not limited to, directly or indirectly, expressly or impliedly, the following: consists of, refers to, reflects, relates to, evidences, concerns, displays, shows, constitutes, comprises, documents, embodies, discusses, identifies, states, pertains to, has as its subject matter, proves or is in any way legally, logically or factually connected with the matter referred to or has a tendency to prove or disprove the matter.

4. Interest: For the purposes of this rider, the term "interest" includes, but is not limited to, the following types of rights, titles, or legal shares: vested, contingent, equitable, legal, beneficial, partial, individual, co-owned or joint.

C. DOCUMENTS REQUESTED

**** Documents previously produced need not be reproduced.****

Manner of Production: All documents and information produced shall be organized and identified to correspond to each production request.

Form of Production: Wherever possible, please produce all documents electronically on thumb drives or other acceptable means.

Documents Requested:

A. All documents and communications evidencing, relating or concerning any gifts received by you from Michael Hastings from November 9, 2020 through the date of production.

B. All documents and communications evidencing, relating or concerning any gifts given to Michael Hastings by you from November 9, 2020 through the date of production.

C. All documents and communications evidencing, relating or concerning any gifts given to the Hastings Children by you from November 9, 2020 through the date of production.

D. All documents related to any contact, in person, oral, written, or electronic between you and Michael Hastings from November 9, 2020 through the date of production.

E. All documents evidencing, relating, or concerning your travel records, including but not limited to itineraries, tickets, bills, receipts for any and all travel to/with Michael Hastings from November 9, 2020 through the date of production.

F. All documents evidencing, relating or concerning Michael Hastings travel records in your control, including but not limited to, itineraries, tickets, bills and receipts, from November 9, 2020 through the date of production.

G. Copies of any and all electronic, digital, or mobile payments or share payments to Michael Hastings, including but not limited to Chase Quick Pay, Venmo, Zelle, Cash App, or any other electronic, digital, or moveable payment service tied to transactions from a bank account, debit card or credit card.

H. Copies of any and all payments made by Michael Hastings on your behalf to any entity from November 9, 2020 through the date of production.

I. Authentication by Certification form (copy enclosed), Please complete, sign and return the Authentication by Certification with your document production. This is an option to attempt to avoid a personal appearance by you at a subsequent court appearance to authenticate your records.

J. Affidavit of Compliance (copy enclosed).
