

FILED DATE: 12/9/2019 12:00 AM 2013CH23386

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

FILED
12/9/2019 12:00 AM
DOROTHY BROWN
CIRCUIT CLERK
COOK COUNTY, IL
2013CH23386

TOWNSHIP TRUSTEES OF SCHOOLS)	
TOWNSHIP 38 NORTH, RANGE 12 EAST,)	
)	No. 13 CH 23386
Plaintiff and Counter-Defendant,)	
)	
v.)	Hon. Thomas M. Mulroy
)	
LYONS TOWNSHIP H.S. DISTRICT 204,)	Calendar I
)	
Defendant and Counter-Plaintiff.)	(Transferred to Law)

7642441

NOTICE OF FILING

Please take notice that on December 8, 2019, we filed the attached LT's Exhibit List (Rev. 12-8-2019).

LYONS TOWNSHIP HIGH SCHOOL
DISTRICT 204

By s/Jay R. Hoffman
Its Attorney

Jay R. Hoffman
Hoffman Legal
20 N. Clark St., Suite 2500
Chicago, IL 60602
(312) 899-0899
jay@hoffmanlegal.com
Attorney No. 34710

CERTIFICATE OF SERVICE

Jay R. Hoffman, an attorney, certifies that on December 8, 2019, he caused the foregoing notice of filing and attached pleading to be served by email on the following attorneys:

Barry P. Kaltenbach
kaltenbach@millercanfield.com

Gerald E. Kubasiak
gekubasiak@quinlanfirm.com

s/Jay R. Hoffman

LT'S EXHIBIT LIST (12-8-2019, subject to revision)

VOLUME 1

Ex.	Description	Reference	Objection	Admitted
A.	<i>TTO Pro Rata Expenses Claim (to FY2012) & LT Setoff Counterclaim (Count I)</i>			
1.	11-6-1998 Coryell Memo	Healy 1 (portion)	YES - Hearsay	
2.	5-26-1999 Beckwith Memo	Healy 1 (portion)	NO	
3.	5-28-1999 LT Fin Cmte Minutes	LT SJ Response 24	NO	
4.	6-4-1999 Kelly Memo	Healy 1 (portion)	NO	
5.	7-27-1999 TTO Board Agenda & Minutes	LT SJ Response 25	NO	
6.	9-29-1999 LT Fin Cmte Minutes	LT SJ Response 27	NO	
7.	2-29-2000+ LT Setoff Memos	LT SJ Response 28	NO	
8.	2-29-2000 Beckwith Memo	Huang Dep 2	NO	
9.	5-2-2000 Cainkar Letter [Redacted]	LT SJ Response 38	YES - Relevance	
10.	6-14-2000 Beckwith Memo	LT SJ Response 32	NO	
11.	7-5-2000 Huang Note	Huang Dep 3	NO	
12.	9-7-2000 Healy Letter	Huang Dep 4	NO	

Ex.	Description	Reference	Objection	Admitted
13.	5-30-2001 Huang Memo	Huang Dep 5	NO	
14.	2-4-2002 Huang Memo	Huang Dep 6	NO	
15.	1-22-2003 Resolution on ICA	Healy Dep 7	NO	
16.	3-10-2003 Huang Memo	Huang Dep 7	NO	
17.	6-5-2013 Kilrea Letter	TTO Doc Production 4	NO	
18.	2-19-2016 Kubasiak Letter	LT SJ Response 38	YES - Relevance	
19.	6-19-2018 Popp Email	LT SJ Response 11	YES - Hearsay	
20.	TTO Pro Rata Expenses Folders – Re: LT	TTO Doc Production 1	NO	
21.	FY2011 TTO Pro Rata Record (loose)	TTO Doc Production 4 REV0278	NO	
B.	<i>TTO Pro Rata Expenses Claim (FY2013)</i>			
22.	4-11-2014 Kilrea Letter	TTO Doc Production 4	NO	
23.	6-19-2014 Kilrea-Birkenmaier Emails	Kilrea Dep 9	NO	
24.	10-8-2014 Kilrea Letter	LT SJ Response 42	NO	
25.	11-21-2014 Birkenmaier Letter	TTO Dep 4	NO	
26.	5-11-2015 Jascula Invoicing Compilation	TTO Doc Production 2	NO	
27.	11-30-2016 Kaltenbach Email - Legacy	LT SJ Response 44	YES - Relevance	

Ex.	Description	Reference	Objection	Admitted
C.	<i>TTO Audit Payments Claim</i>			
28.	2-9-1994 Jackson Letter	Conway Dep 1	NO	
29.	8-28-2006 TTO Meeting Minutes	Healy Dep 6	NO	
30.	10-26-2011 Baker Tilly Invoice for 999	TTO 2d Rev SJ Motion 3	NO	
31.	12-27-2010 Baker Tilly Invoice for 999	TTO 2d Rev SJ Motion 3	NO	
D.	<i>LT's Insurance Proceeds Claim (Count II)</i>			
32.	6-6-2013 Proof of Claim	Thiessen Dep 3	NO	
33.	6-6-2013 Bradley Memo	TTO Doc Production 2	NO	
34.	8-4-2013 Settlement - Liberty Mutual	Thiessen Dep 1	NO	
35.	6-25-2014 Settlement - Hanover	Thiessen Dep 2	NO	
36.	7-11-2014 Birkenmaier Email	LT Mtn Reconsid SOL 14	YES - Hearsay	
37.	3-22-2017 Kilrea Letter	LT554-59	NO	
38.	4-21-2017 Kilrea Letter	LT561-62	NO	
39.	6-20-2017 Kilrea Letter	LT564	NO	
40.	9-26-2017 Kilrea Letter	LT566	NO	
41.	10-26-2017 Kubasiak Letter	LT568-74, 586-97	NO	

Ex.	Description	Reference	Objection	Admitted
42.	12-20-2017 Kilrea Letter	LT650	NO	
43.	1-9-2018 Birkenmaier Email +	LT669-71	NO	
44.	TTO FY2018 Financial Statements	TTO Website	NO	
<i>E. Additional</i>				
45.	TTO FY2013 Financial Statements	LT SJ Response 4	NO	
46.	Complete Idiot's Guide (excerpt)	Sylvester Dep 7		
47.	Guerrilla Guide (excerpt)	Sylvester Dep 8		
<u>VOLUME 2</u>				
48.	LT-TTO Communications 2013	LT Doc. Prod.		
49.	LT-TTO Communications 2014	LT Doc. Prod.		
50.	LT-TTO Communications 2015	LT Doc. Prod.		
51.	LT-TTO Communications 2016	LT Doc. Prod.		
52.	LT-TTO Communications 2017	LT Doc. Prod.		
53.	LT-TTO Communications 2018	LT Doc. Prod.		
54.	LT-TTO Communications 2019	LT Doc. Prod.		

Ex.	Description	Reference	Objection	Admitted
55.	7-15-1999 Healy Letter	TTO Doc. Prod.		
56.	4-11-2014 Kilrea Letter on Software	LT Doc. Prod.		
57.	7-8 2018 Emails on West 40	LT Doc. Prod.		
58.	West 40 Loan Doc.	TTO Doc. Prod.		
59.	West 40 Collateral Balance Doc.	TTO Doc. Prod.		
60.	6-8-1988 Sub. Life News Article	LT Doc. Prod.		
61.	Audit Fee Payments (w/date cutoffs)	TTO DepEx 12		
62.	TTO Pro Rata Bill Listing	TTO DepEx 17		
63.	LT Summary Pro Rata Deductions	LT Doc. Prod.		
64.	LT Listing - Undist. Net Income Due	LT Doc. Prod.		
65.	TTO Invest. Policy 2013	TTO Doc. Prod.		
66.	TTO Invest. Policy 2018	TTO Doc. Prod.		
67.	9-30-2019 TTO Investment Analysis	TTO Website		
68.	Birkenmaier Emails on West 40	TTO Doc Prod.		
69.	11-12-2019 Thiessen Letter	Sent to LT		

Ex.	Description	Reference	Objection	Admitted
70.	12-14-2016 TTO LADSE Presentation	TTO Doc. Prod.		
71.	5-3-2018 Birkenmaier Pro Rata Memo	TTO Doc. Prod.		
72.	5-8-2019 Getty Pro Rata Memo	TTO Doc. Prod.		
73.	11-2016 LT-TTO Comm. On Invest.	LT Doc. Prod.		

Note: LT reserves its right to use pleadings, discovery responses, deposition transcripts, impeachment material, evidence to refresh recollection, rebuttal materials, admissions of the TTO, and exhibits of the TTO that LT did not object to during the trial. LT reserves the right update this exhibit list prior to trial.