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Fax Cover Sheet

DATE: 12/9/2025

TO: Keeper of Records

COMPANY: Midwest Orthopaedics at Rush **FAX:** 708-409-5179

FROM: Catherine Clough **PHONE:** (312) 277-3000

COMPANY: Knell, O'Connor, Danielewicz **FAX:** (312) 277-3008

SUBJECT: Anthony Deseno v ICH Construction Companies LLC

KOD FILE NO: 11176-ZUR

Please find attached our subpoena seeking records and films from Midwest Orthopaedics at Rush concerning Anthony Deseno. We ask that you please process the subpoena and forward the records/films to our office as soon as possible. Thank you.

Catherine Clough,
on behalf of Atty. J. Murray Pinkston III

If you do not receive all pages clearly, please email our team at paralegals@knelloconnor.com.

This facsimile transmission is intended only for the addressee shown above. It may contain information that is privileged, confidential or otherwise protected from disclosure. Any review, dissemination or use of this transmission or its contents by persons other than the addressee is strictly prohibited. If you have received this transmission in error, please notify us immediately by telephone and mail the original to us at the above address.

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December 9, 2025

via Fax and Mail

Midwest Orthopaedics at Rush
Attn: Keeper of Records
1611 W Harrison St.,
Chicago, IL 60612
Fax: 708-409-5179

RE: Anthony Deseno v ICH Construction Companies LLC
Case Number: 24 WC 033489
Patient DOB: 01/12/1979
Date of Loss: 10/31/2024

Dear Sir or Madam:

Enclosed please find a subpoena request for the **production of any and all records**, pertaining to the above-named Employee, to the law office of Knell O'Connor Danielewicz. Our office represents the insured, **ICH Construction Companies LLC**. You may avoid appearing at the Illinois Workers' Compensation Commission by providing certified copies of the requested records to our office prior to the date listed (see enclosed subpoena).

Please be advised that per *45 CFR 164.512(l)*, HIPAA authorization is not required to disclose information regarding claimant as said information is requested in order to adjudicate the instant claim.

The Illinois Workers' Compensation Act 820 ILCS 305/16 requires Certification of all records and bills. Thus, by law your offices **MUST** complete the certification statement attached and return it with the subpoenaed records described herein.

Records **MUST** be transmitted to our office electronically via email and/or facsimile. DVD's, CD's, and flash drives are to be mailed to our office. Hard copies of the records are optional and, if provided, may be mailed to our office. We appreciate your anticipated cooperation.

Very truly yours,

KNELL O'CONNOR DANIELEWICZ

Anthony F. Johnson

J. Murray Pinkston, III

Electronic Delivery of Records:

Email: paralegals@knelloconnor.com or Fax: (312) 277-3008

JMP/cc Enclosure: subpoena

BEFORE THE ILLINOIS WORKERS' COMPENSATION COMMISSION

ANTHOY DESENO,**Petitioner,****v.****ICH CONSTUCTION COMPANIES LLC,****Respondent.**

24 WC 033489

RECORDS CERTIFICATION

___ On behalf of **Midwest Orthopaedics at Rush**, I certify that in response to the Subpoena issued, the attached records and bills are true, complete and correct copies of the original records and are the only such records relating to the above-named Petitioner in my/our possession and control.

___ After a thorough search, we were **NOT** able to find any records pertaining to the above-named Petitioner.

Signature

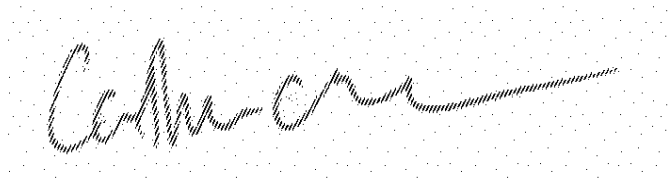
Date

Illinois Workers' Compensation Commission
Proof of Service

I, Catherine Clough, affirm that a copy of this subpoena was sent on 12/9/2025, to each party at the address listed below:

via Fax and Mail

Midwest Orthopaedics at Rush
Attn: Keeper of Records
1611 W Harrison St.,
Chicago, IL 60612
Fax: 708-409-5179

A handwritten signature in cursive script, appearing to read 'Catherine Clough', is written on a background of a dotted grid pattern.

Signature of Person completing *Proof of Service*

IN THE NAME OF THE PEOPLE OF THE STATE OF ILLINOIS
ILLINOIS WORKERS' COMPENSATION COMMISSION
SUBPOENA



Anthony Deseno
Employee/Petitioner

Case # **24 WC 033489**

v.
IHC Constructions Companies, LLC
Employer/Respondent

To: **Midwest Orthopedics at Rush, 1611 W. Harrison St, Chicago, IL 60612**

YOU ARE COMMANDED TO PROVIDE THE FOLLOWING ITEMS THAT ARE IN YOUR POSSESSION OR CONTROL: ANY AND ALL CORRESPONDENCE, MEMORANDA OR OTHER DOCUMENTS EXCHANGED BETWEEN DEPONENT HEREIN AND THE PATIENT, OTHER MEDICAL PROVIDER, OTHER MEDICAL INSTITUTION, OR ANY OTHER ATTORNEYS OR REPRESENTATIVES OR INSURANCE COMPANIES, AND ANY AND ALL RECORDS INCLUDING BUT NOT LIMITED TO MEDICAL REPORTS, MEDICAL RECORDS, CHART NOTES, OFFICE NOTES, ITEMIZED BILLING, PROGRESS NOTES, RECORDS, REVIEWED DIAGNOSTIC TEST RESULTS AND FILMS INCLUDING RADIOLOGICAL RECORDS AND REPORTS INCLUDING BUT NOT LIMITED TO THE MRI FILMS, OR ANY OTHER RECORDS IN YOUR POSSESSION OR CONTROL RELATING TO:

NAME: ANTHONY DESENO | DOB: 01/12/1979 | SEX: MALE

*****PER 45 CFR 164.512(L), HIPAA AUTHORIZATION IS NOT REQUIRED TO DISCLOSE INFORMATION REGARDING CLAIMANT AS SAID INFORMATION IS REQUESTED IN ORDER TO ADJUDICATE THE INSTANT CLAIM*****

☐ YOU MUST APPEAR TO TESTIFY BEFORE THE HONORABLE _____ OF THE COMMISSION AT THE ADDRESS **50 W. WASHINGTON ST, CHICAGO, IL 60602** ON THE DATE _____ AT _____ AM/PM, TO BRING THE ITEMS WITH YOU.

☒ MAIL ITEMS TO THE ADDRESS:
Knell O'Connor Danielewicz | 901 W. Jackson Blvd. Suite 301 Chicago, IL 60607

SEND DIGITAL RECORDS TO:
paralegals@knelloconnor.com | Fax: (312) 277-3008

BY THE DATE **1/5/2026**.

YOU DO NOT NEED TO APPEAR AT THE COMMISSION. *DO NOT MAIL THE ITEMS TO THE COMMISSION.*****

J. Murray Pinkston III
Name of person requesting this subpoena

(312) 277-3000
Telephone number

paralegals@knelloconnor.com
Email address

FAILURE TO RESPOND
TO THIS SUBPOENA MAY SUBJECT
YOU TO THE PENALTIES
PRESCRIBED BY LAW.
(SEE STATUTES: 820 ILCS 305/16; RULES: 7030.50)

Chairman Joanna M. Fratianni
12/9/2025
Date

The legislature changed the name of the Illinois Industrial Commission to the Illinois Workers' Compensation Commission, effective 1/1/05. The law states that any reference to the Industrial Commission—such as those that appear below—shall be considered a reference to the Workers' Compensation Commission.

From the Rules Governing Practice Before the Industrial Commission

50 Illinois Administrative Code

Section 7030.50 Subpoena Practice

a) Issuance

A blank form of subpoena for the attendance of witnesses or the production of documents will be furnished by the Secretary of the Commission upon request of the parties or their attorneys.

b) Use

Unless otherwise agreed by the parties, witnesses or documents may only be subpoenaed to appear or be produced at the time and place set for hearing of the cause.

c) Service

Personal service of the subpoena is required and payment of statutory fee and travel expense must accompany the service.

d)

- 1) Upon failure of any person, firm or organization to obey a subpoena of the Illinois Industrial Commission, a party seeking enforcement of the subpoena, or his attorney, shall prepare an application to the Circuit Court of the county in which the hearing or claim is pending requesting enforcement of the subpoena pursuant to Section 16 of the Illinois Workers' Compensation Act and shall present, file and serve on opposing party said application together with the original subpoena and proof of service to the Arbitrator or Commissioner designated to hear the said claim, or if no Arbitrator or Commission has been designated, then to the Chairman of the Commission.
- 2) A hearing pursuant to Section 7020.70 shall be held at which the Commissioner or Arbitrator to whom the application is presented shall determine if the subpoena requested relevant information, and was properly issued and served and if the application is proper in form. If the said Commissioner or Arbitrator shall so find, then, he or she shall sign the application. The party seeking enforcement of the subpoena, or his attorney, may then file and prosecute the application in the Circuit Court.