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Attorneys at Law

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## Fax Cover Sheet

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**DATE:** 1/8/2026

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**TO:** Keeper of Records

**COMPANY:** Advanced Orthopedic and Spine Care, SC **FAX: (708) 599-0801**

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

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

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**SUBJECT:** Michael Gaynor v F.H. Paschen

**KOD FILE NO:** 11191-ZUR

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Please find attached our subpoena seeking records and films from Advanced Orthopedic and Spine Care, SC concerning Michael Gaynor. 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](mailto: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.

**Knell  
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Suite 201  
Chicago, IL 60607  
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January 8, 2025

**via Fax and Mail**

Advanced Orthopedic and Spine Care, SC  
Attn: Keeper of Records  
6701 W 95<sup>th</sup> Street  
Oak Lawk, IL 60453  
708-599-0801

**RE: Michael Gaynor v F.H. Paschen**  
**Case Number: 24 WC 016818**  
**Patient DOB: 6/19/1969**

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, **F.H. Paschen**. 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**



J. Murray Pinkston, III

**Electronic Delivery of Records:**

Email: [paralegals@knelloconnordanielewicz.com](mailto:paralegals@knelloconnordanielewicz.com) or Fax: (312) 277-3008

JMP/cc

Enclosure: subpoena

BEFORE THE ILLINOIS WORKERS' COMPENSATION COMMISSION

<div>MICHAEL GAYNOR,</div> <div>Petitioner,</div> <div>v.</div> <div>F.H. PASCHEN,</div> <div>Respondent.</div>	<div>24 WC 016818</div>
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RECORDS CERTIFICATION

\_\_\_ On behalf of Advanced Orthopedic and Spine Care, SC, 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

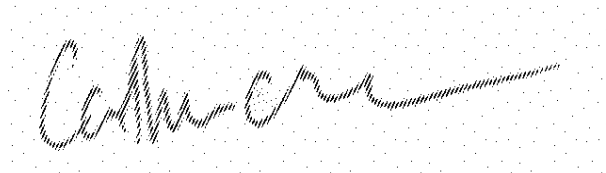
\_\_\_\_\_  
Date

Illinois Workers' Compensation Commission  
*Proof of Service*

I, Catherine Clough, affirm that a copy of this subpoena was sent on 1/8/2026, to each party at the address listed below:

*via Fax and Mail*

Advanced Orthopedic and Spine Care, SC  
Attn: Keeper of Records  
6701 W 95th Street  
Oak Lawk, Il 60453  
708-599-0801

A handwritten signature in cursive script, appearing to read 'Catherine Clough', is written over a grid of small dots. The signature is fluid and extends across the width of the dotted area.

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Signature of Person completing *Proof of Service*

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



**Michael Gaynor**

Case # **24 WC 016818**

Employee/Petitioner

v.

**F.H. Paschen**

**\*\*\*RUSH\*\*\***

Employer/Respondent

To: **Advanced Orthopedic and Spine Care, SC, 6701 W 95th Street, Oak Lawk, Il 60453**

**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: ROBERTO DELGADO | DOB: 06/01/1968 |**

**\*\*\*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 **12/15/2025**.

**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

**12/1/2025**

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.