

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

LUCILLE LOCKHART, as mother)	
and natural guardian of Isaiah Lockhart,)	
)	
Petitioner,)	
)	
v.)	No.
)	
COUNTY OF COOK, a municipal)	
corporation,)	
)	
Respondent in Discovery.)	

**VERIFIED PETITION FOR DISCOVERY BEFORE SUIT TO IDENTIFY
RESPONSIBLE PERSONS AND ENTITIES PURSUANT TO Ill Sup Ct R 224**

NOW COMES the Petitioner, LUCILLE LOCKHART, as mother and natural guardian of Isaiah Lockhart, by her attorneys, FICHERA & MILLER, and states the following as to Respondent in Discovery, COUNTY OF COOK, a municipal corporation, (hereinafter “John H. Stroger, Jr. Hospital”):

1. On July 31, 2009 Isaiah Lockhart was a patient at John H. Stroger, Jr. Hospital.
2. During the course of Isaiah Lockhart’s treatment at John H. Stroger, Jr. Hospital records were kept regarding his treatment.
3. During such time, Isaiah Lockhart came under the care and treatment of certain physicians whose identity Petitioner has been unable to ascertain.
4. Upon information and belief, said records contain the names of the parties responsible for the accident, including but not limited to the physicians that treated him.
5. On the date aforesaid, Isaiah Lockhart was injured while present at John H. Stroger, Jr. Hospital.
6. An authorization signed by Lucille Lockhart, as mother and natural guardian of Isaiah Lockhart, is attached hereto as Exhibit A.
7. Petitioner brings this action pursuant to Ill Sup Ct R 224 in order to ascertain the identities of those who are responsible for Petitioner's injuries.

WHEREFORE, the Petitioner, Petitioner, LUCILLE LOCKHART, as mother and natural guardian of Isaiah Lockhart, prays for relief from this Honorable Court as follows:

1. That this Court enter an Order requiring the Respondent in Discovery, John H. Stroger, Jr. Hospital, to produce the following:
 - (a) All records pertaining to Isaiah Lockhart's treatment on July 31, 2009 at John H. Stroger, Jr. Hospital.
 - (b) A list of all doctors, nurses, and staff who participated in the treatment of Isaiah Lockhart.
 - (c) Any and all additional documents, photographs, witness statements, films and investigative reports relating to the occurrence aforesaid.
2. That this Court enter an Order requiring Respondent to preserve and to maintain all of the original records, documents and artifacts set forth above and prevent their loss or destruction until further Order of Court.
3. That this Court enter an Order permitting Petitioner, by his attorneys and such individuals retained by his attorneys, to examine said records and documents for purposes of identification and inspection.
4. And for such other relief as the Court deems proper.

Respectfully submitted,

FICHERA & MILLER
Attorneys for Plaintiffs

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Verification by Attorney

The undersigned attorney states that he has read the above and foregoing pleading, motion or other document; that to the best of his knowledge, information and belief formed after a reasonable inquiry, that it is well-grounded in fact and is warranted by existing law or a good faith argument for the extension, modification or reversal of existing law and that it is not interposed for any improper purpose, such as to harass or to cause unnecessary delay or needless increase in the cost of litigation.

By: _____
One of Plaintiff's Attorneys