

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
Municipal Department, First District

«PLAINTIFF», )  
 )  
 Plaintiff, )  
 )  
 -vs- ) NO. «CIRCUITCOURTNO»  
 )  
 «DEFENDANT», )  
 )  
 Defendant. )

**NOTICE TO PRODUCE**

TO: <<Attorney For Landlord>>  
<<Add1LandlordAtty>>  
<<Add2LandlordAtty>>  
Chicago, IL <<Zip>>

<<Plaintiff>>, (hereinafter referred to as "landlord"), is hereby requested, pursuant to Illinois Supreme Court Rule 214, to PRODUCE for inspection and copying to the law office of Paul Bernstein, counsel for Defendant, Counter-Plaintiff (hereinafter referred to as "tenant") the following items:

1. Any and all correspondence, notations, and writings between Plaintiff, (hereinafter referred to as "landlord"), and Defendant, (hereinafter referred to as "tenant") not heretofore produced in these proceedings;
2. Any and all correspondence, notations, and log entries between landlord and tenant based on telephone communications not heretofore produced in these proceedings;
3. Any and all photographs of the building or tenant's apartment during the time of tenant's residency and to the date of the filing of the within eviction proceedings, not heretofore produced in these proceedings;
4. Originals of any and all lease(s) executed between landlord and tenant as to the apartment unit that is the subject of the within lawsuit filed by Plaintiff not heretofore produced in these proceedings.
5. Any and all applications to rent, correspondence, notices, letters, computer generated data regarding building code violations, inspections, compliance board hearings and Housing Court lawsuits for the building for the last year immediately preceding the filing of the within lawsuit by Plaintiff not heretofore produced in these proceedings;
6. Copies of all permits and certificates of operation issued by the City for the building for

the last year immediately preceding the filing of the within lawsuit by Plaintiff not heretofore produced in these proceedings;

7. Any and all correspondence, notations, and log entries between landlord and the managers, janitor or other trades person regarding repairs and maintenance to tenant's apartment and the common areas of the building from the date Defendant became a tenant of Plaintiff, to the present date not heretofore produced in these proceedings;
8. Receipts, paid bills and records showing disbursements by landlord for repairs and maintenance to tenant's apartment and common areas of the building for the period of tenants occupancy of tenant's apartment not heretofore produced in these proceedings;
9. An affidavit from the party producing the above requested items that the production is complete in accordance with this request not heretofore produced in these proceedings.

---

Attorney for Defendant, Counter-Plaintiff

### **CERTIFICATE OF MAILING**

Under penalties as provided by law pursuant to 735 ILCS 5/1-109 of the Code of Civil Procedure, the undersigned attorney for Defendant, Counter-Plaintiff, certifies that I caused a copy of the foregoing NOTICE TO PRODUCE to be mailed to the Plaintiff at said Plaintiff's address before 5:00 p.m., <<MailingDateProduce>> by putting said pleading in an envelope properly addressed to said attorney with postage fully prepaid and depositing said envelope in the U.S. Mailbox located in the Richard J. Daley Center, Chicago, Illinois

---

Attorney for Defendant, Counter-Plaintiff

Paul Bernstein,  
Counsel for Defendant, Counterplaintiff  
333 E. Ontario St. – Ste. #2102B  
Chicago, IL 60611  
(866) 769-2892  
Atty. No. 26707

C:\Fleischer Ron\Notice\_to\_Produce.doc