

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

GMAC,)	
Plaintiff,)	
)	
vs.)	No.: 07 CH 29738
)	
JOSEPH YOUNIS, et. al.,)	
Defendants.)	

PETITION FOR RULE TO SHOW CAUSE AGAINST JOHN LAROCQUE

Now comes the Counter-Plaintiff, RICHARD DANIGGELIS, through his attorney, Andjelko Galic, and moves this court of an order finding John P. LaRocque in indirect civil contempt. In support of his petition Counter-Plaintiff, RICHARD DANIGGELIS, states as follows:

1. On January 4, 2016 a subpoena was issued to John LaRocque requiring him to appear for a deposition at 134 N. LaSalle Street, Suite 1040 in Chicago, Illinois 60602. See attached Exhibit "A", a copy of subpoena issued to John LaRocque
2. On January 12, 2016 John LaRocque was served with this subpoena. See attached Exhibit "B".
3. John LaRocque did not appear for his deposition testimony that was scheduled for January 29, 2016 as required by the subpoena and he failed to contact Counter-Plaintiff attorney's office to schedule his deposition at some other time.
4. The subpoena served on John LaRocque contained specific language advising him that his "failure to respond to this subpoena will subject you to punishment for contempt of this court".

ELECTRONICALLY FILED
 3/8/2016 8:30 AM
 2007-CH-29738
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 CHANCERY DIVISION
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5. John LaRocque's failure to comply with subpoena was intentional and without any legal justification.

6. As a result of John LaRocque's refusal to comply with this subpoena Counter-Petitioner was forced to incur additional attorney's fees and expenses.

Wherefore, Counter- Petitioner, RICHARD DANIGGELIS, prays for an order issuing a rule to show cause against John LaRocque returnable at a date certain, requiring him to appear in court and to explain why he should not be held in indirect civil contempt for his failure to appear for his January 29, 2016 deposition and ordering him to pay for legal fees incurred in having to bring this Petition for Rule to Show Cause.

Respectfully submitted


/s/ Andjelko Galic

Attorney for Richard Daniggelis

Law Firm of Andjelko Galic, Inc.
34 N. LaSalle Street
Suite 1040
Chicago, Illinois 60602
Tel. 312 986 1510
Attorney No.: 33013

VERIFICATION

I, Andjelko Galic, under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, certify that I have read the above Petition for Rule to Show Cause and that statements given in this Petition are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certify as aforesaid that they verily believe the same to be true.

March 7, 2016



Andjelko Galic



GMAC

Plaintiff/Petitioner

No. 07 CH 29738

YOUNES

Defendant/Respondent

SUBPOENA IN A CIVIL MATTER (For Testimony and/or Documents)

To: John P. La Rocque
2 Orchard Place
Hinsdale, IL 60521

- 1. YOU ARE COMMANDED to appear to give your testimony before the Honorable...
2. YOU ARE COMMANDED to appear and give your deposition testimony before a Notary Public at: 134 N LaSalle Street...
3. YOU ARE COMMANDED to mail the following documents in your possession or control to...

Description continued on attached page(s).
YOUR FAILURE TO RESPOND TO THIS SUBPOENA WILL SUBJECT YOU TO PUNISHMENT FOR CONTEMPT OF THIS COURT.

Notice to Deponent:

- 1. The deponent is a public or private corporation, partnership, association, or governmental agency. The matter(s) on which examination is requested are as follows: Please bring any and all documents that you have in your possession related to the sale of property located at 1720 N Sedgwick, Chicago, IL 60614 including any correspondence or emails related to this sale prior or substitute to the sale date of July 28, 2006.

Description continued on attached page(s).
(A nonparty organization has a duty to designate one or more officers, directors, or managing agents, or other persons to testify on its behalf, and may set forth, for each person designated, the matters on which that person will testify. Ill. Sup. Ct. Rule 206.)

- 2. The deponent's testimony will be recorded by use of an audio-visual recording device, operated by...
3. No discovery deposition of any party or witnesses shall exceed three hours regardless of the number of parties involved in the case, except by stipulation of the parties or by order upon showing that good cause warrants a lengthier examination. Ill. Sup. Ct. Rule 206(d).

Atty. No. 33013 Pro Se 99500
Name: Andjelko Galic
Atty. for: Defendant
Address: 134 N LaSalle Street, Suite 1040
City/State/Zip: Chicago, IL 60602
Telephone: 312 986 1510

Issued by: [Signature] Signature

- Attorney
Clerk of Court

Date:

I served this subpoena by mailing a copy, as required by Ill. Sup. Ct. Rules 11, 12 and 204(a)(2), to 2 Orchard Place, Hinsdale, IL 60521 by certified mail, return receipt requested (Receipt # 7014 3490 0001 4680 5479) on January 4, 2016. I paid the witness \$ 25.00 for witness and mileage fees.

I served this subpoena by handing a copy to on. I paid the witness \$ for witness and mileage fees.

(Signature of Server) ANDJELKO GALIC (Print Name)
DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS



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Tracking Number: 70143490000146805479

Product & Tracking Information

Postal Product:
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Return Receipt

See tracking for related item: 9590952106150275668477

Available Actions

Text Updates

Email Updates

DATE & TIME	STATUS OF ITEM	LOCATION
January 12, 2016, 4:51 pm	Delivered	HINSDALE, IL 60521
Your item was delivered at 4:51 pm on January 12, 2016 in HINSDALE, IL 60521.		
January 7, 2016, 12:54 pm	Notice Left (No Secure Location Available)	HINSDALE, IL 60521
January 7, 2016, 10:55 am	Out for Delivery	HINSDALE, IL 60521
January 7, 2016, 10:45 am	Sorting Complete	HINSDALE, IL 60521
January 7, 2016, 5:54 am	Arrived at Unit	OAK BROOK, IL 60523
January 6, 2016, 3:07 pm	Departed USPS Destination Facility	FOX VALLEY, IL 60599
January 6, 2016, 10:15 am	Arrived at USPS Destination Facility	FOX VALLEY, IL 60599
January 6, 2016, 5:39 am	Departed USPS Facility	BEDFORD PARK, IL 60499
January 5, 2016, 10:03 pm	Arrived at USPS Destination Facility	BEDFORD PARK, IL 60499
January 5, 2016, 6:09 pm	Departed Post Office	CHICAGO, IL 60699
January 4, 2016, 11:18 pm	Acceptance	CHICAGO, IL 60699

Track Another Package

Tracking (or receipt) number

70143490000146805479

Track It

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