

IN THE CIRCUIT COURT  
SEVENTH JUDICIAL CIRCUIT  
SANGAMON COUNTY, ILLINOIS

WILLIAM EBERT, d/b/a American )  
Auto Body, )  
 )  
Plaintiff, )  
 )  
vs. )  
 )  
STATE FARM MUTUAL AUTOMOBILE )  
INSURANCE COMPANY, )  
 )  
Defendant. )

No. 93-L-58

**DEFENDANT'S ANSWERS TO RULE 213(f) INTERROGATORIES**

Now comes the Defendant, STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY, through its attorneys, REED, ARMSTRONG, GORMAN, COFFEY, GILBERT & MUDGE, P.C., and furnishes the identity and location of witnesses who will testify at trial, together with the subject of their testimony as follows:

1. Consistent with their discovery depositions taken in this case, the following witnesses will testify about the facts and circumstances surrounding the repair of their damaged vehicles, as well as their insurance claims for the repair of their damages vehicles, specifically the circumstances surrounding communications with repair facilities and State Farm:

- Paul Myers, R. R. #1, Box 43, Mt. Pulaski, IL 62548
- Nelson Capitano, 2505 Huntleh, Springfield, IL 62704
- Dennis Werth, 1804 Mayfield, Chatham, IL 62629
- Sarunus Valukenas, 55 Gulf Road, Springfield, IL 62704
- Monica Whalen, R. R. #3, Box 91, Auburn, IL 62615
- John Marley, R. R. #1, Box 9, Laomi, IL 62661

2. The following witnesses will offer testimony consistent with their depositions, their conversations with Plaintiff Bill Ebert as well as their knowledge concerning the State

**EXHIBIT A**

**Farm/American Auto Body litigation.**

Manny Gaston, 601 11th Licoln, Lincoln, IL 62656  
Dick Taylor, 2947 Rochester Road, Springfield, IL 62703  
Brad Zara, 3117 Wide Track Drive, Springfield, IL 62703

3. The following witness will testify concerning his experiences in working for Bill Ebert and consistently with his statement previously produced in discovery:

Steven Michael Singer, R. R. #5, 280 Trilium Lane, Springfield, IL

4. The following witnesses will testify consistent with the statements they gave concerning the facts and circumstances surrounding the repair of their damaged vehicles, their insurance claim related to the repair of their damaged vehicles, and the facts and circumstances surrounding communications with repair facilities and State Farm concerning their vehicle repair:

Paul Myers, R. R. #1, Box 43, Mt. Pulaski, IL 62548  
Nelson Capitano, 2505 Huntleh, Springfield, IL 62704  
Sarunus Valukenas, 55 Gulf Road, Springfield, IL 62704  
John Maloney, 1204 West Ash, Springfield, IL 62704  
Steve Mills, R. R. #2, Box 45, Rochester, IL 62563  
Deborah Van Sacik, 106 East Hawkeye, Springfield, IL 62707  
Margaret Tin, 3313 Branchwood, Springfield, IL 62704  
Alan Pregoizin, 1129 South Spring, Springfield, IL 62704  
Elaine Galli, 1720 Gerome Avenue, Springfield, IL 62704  
Brian Wood, 2829 Burnstine Road, Auburn, IL 62615  
Robert O'Keefe, 5913 South Cantrall Creek Road, Cantrell, IL 62625  
Mr. & Mrs. Robert Shipman, c/o Springfield Police Department,  
Springfield, IL 62701  
Emma Jesberg, Jr., 2003 South Walnut, Springfield, IL 62704  
Larry Durham, Box 323, Dawson, IL 62520  
Sandy Klunick, 5707 Old Salem Lane, R. R. #6, Springfield, IL 62707  
Cindy Evans, 3930 North Walnut Street Road, Springfield, IL 62707

5. The following individuals will testify consistent with their surreptitiously recorded telephone statements previously produced in discovery by Plaintiff. The individuals will also testify about the facts and circumstances surrounding the repair of their damaged

vehicles, their insurance claims related to the repairs of their damaged vehicles, the facts and circumstances surrounding communication with repair facilities and State Farm regarding repair of their damaged vehicles:

Mike Taylor, 2947 Rochester Road, Springfield, IL 62703  
Sarunus Valukenas, 55 Gulf Road, Springfield, IL 62704  
Dick Taylor, 2947 Old Rochester Road, Springfield, IL 62703  
Ted Urbanski, 1825 South Pasfield, Springfield, 62704  
Paul Lellelid, R. R. #2, Litchfield, IL 62056  
Nancy Hood, 2700 Bennington Drive, Springfield, IL 62704  
Alan Pregozi, 1129 South Spring, Springfield, IL 62704  
Beth Duesterhaus, 320 Bens Drive, Chatham, IL 62629  
Pete Van Geisen, 3928 Rocky Falls Road, Springfield, IL 62707  
Charles Miller, 603 North Daniel, Springfield, IL  
Mickey Reed, 1216 Old Crows Way, Springfield, IL 62707  
Greg Metejka, 2501 Plateau, Springfield, IL 62707  
Larry Jones, 703 South McArthur Blvd., Springfield, IL 62704  
Scott Walter, 203 Pleasant Lane, Rochester, IL 62563

6. The following witnesses will testify consistently with their depositions and/or surreptitiously recorded telephone conversations, as well as their employment with State Farm, personal contacts with Bill Ebert/American Auto Body, and the removal of American Auto Body from the repair facility reference guide:

Terry Feldmann, State Farm Insurance Company, Claims Service Center,  
2801 West Lawrence, Springfield, IL 62704  
Sally Rubel, State Farm Insurance Company, Claims Service Center,  
2801 West Lawrence, Springfield, IL 62704  
Bob Swartz, State Farm Insurance Company, Claims Service Center,  
2801 West Lawrence, Springfield, IL 62704  
Jim Hayden, State Farm Insurance Company, Claims Service Center,  
2801 West Lawrence, Springfield, IL 62704  
Jim Ford, State Farm Insurance Company, 2702 Ireland Grove Road,  
Bloomington, IL 61709-001  
Butch McDow, State Farm Insurance Company, Claims Service Center,  
2801 West Lawrence, Springfield, IL 62704  
Richard Skelton, State Farm Insurance Company, Claims Service Center,  
2801 West Lawrence, Springfield, IL 62704  
Chris Coyne, State Farm Insurance Company, Claims Service Center,  
2801 West Lawrence, Springfield, IL 62704

Don Hartman, 13 Somerset Court, Bloomington, IL 61701  
Susan Maxwell, State Farm Insurance, 2702 Ireland Grove Road,  
Bloomington, IL 61709  
Earnest Hudson, State Farm Insurance, 2702 Ireland Grove Road,  
Bloomington, IL 61709  
Melissa Paschold, State Farm Insurance, 2702 Ireland Grove Road,  
Bloomington, IL 61709  
Susan Connor, State Farm Insurance Company, Claims Service Center,  
2801 West Lawrence, Springfield, IL 62704  
Gary Weakly, State Farm Insurance, 2702 Ireland Grove Road,  
Bloomington, IL 61709  
Tracy Shaw, State Farm Insurance Company, Claims Service Center,  
2801 West Lawrence, Springfield, IL 62704

7. The following witnesses will testify consistent with their discovery depositions as to the removal of American Auto Body from State Farm's repair facility reference guide, the relationship between State Farm and American Auto Body as well as the claimed damages in this case. The witnesses will also testify consistently with their statements and letters generated and produced in discovery:

Sarunus Valukenas  
Dick Taylor  
Wade Ebert  
Manny Gaston  
Bill Ebert  
Dale Emerson, 320 W. Washington, Springfield, IL 62767

8. Defendant discloses the following witnesses which have been disclosed by Plaintiff as offering trial testimony whose testimony is yet unknown:

Mark Miller  
Mike McGee  
Tim Warren  
Richard Diamond  
Pinkey Williams  
Jill Miller

9. The following witnesses will testify concerning the claimed damages in this case, specifically plaintiff's claim for lost profits during the years following the removal from the

**Repair Facility Reference Guide:**

**David Bernett, 1000 Myers Building, One West Old State Capitol Plaza  
Springfield, IL 62701**

**Pam McClelland, 1000 Myers Building, One West Old State Capitol Plaza  
Springfield, IL 62701**

**Jay Buck, 26503 West Lawrence, Springfield, IL 62704**

**Leno M. Meneghetti, 1225 Monument Avenue, Springfield, IL**

**REED, ARMSTRONG, GORMAN, COFFEY,  
GILBERT & MUDGE, P.C.**

**BY:**



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**Michael J. Bedesky, #06206551  
Attorneys for Defendant  
State Farm Mutual Automobile  
Insurance Company  
101 W. Vandalia, Suite 300  
Edwardsville, IL 62025  
(618) 656-0257**