

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

HARVEST BIBLE CHAPEL, THROUGH)
JAMES SCOTT MILHOLLAND, COO; RONALD)
DUITSMAN, ELDER BOARD CHAIRMAN;)
WILLIAM SPERLING, ELDER BOARD)
MEMBER; AND JAMES S. MACDONALD,)
BOTH INDIVIDUALLY AND AS SENIOR)
PASTOR OF HARVEST BIBLE CHAPEL,)

Plaintiffs,)

vs.)

No. 2018 L 011219

RYAN MICHAEL MAHONEY, MELINDA)
MAHONEY, SCOTT WILLIAM BRYANT,)
SARAH BRYANT, AND JULIE STERN ROYS,)

Defendants.)

DEFENDANT JULIE STERN ROYS'
REQUESTS FOR PRODUCTION TO PLAINTIFFS

Julie Stern Roys ("Roys"), by and through its counsel of record, Rathje Woodward LLC, pursuant to Ill. Sup. Ct. R. 214 hereby propounds the following Requests for Production upon the plaintiffs, which shall be responded to within twenty-eight (28) days from service in accordance with the Definitions and Instructions below.

INSTRUCTIONS

A. Each request must be answered upon your entire knowledge from all sources, including all information in the possession of you, your attorneys, or persons working for you or on your behalf.

B. Where a request cannot be responded to in full, state why and furnish all available information.

C. Each request must be responded to separately and as completely as possible. The fact that an investigation is continuing and discovery is not complete must not be used as a reason for failure to respond as fully as possible.

D. The plaintiffs must produce the responsive records in the condition in which they are ordinarily maintained at 300 E. Roosevelt Road, Wheaton, Illinois 60187.

DEFINITIONS

A. "Harvest" refers to plaintiff Harvest Bible Chapel.

B. The "Complaint" refers to the plaintiffs' Complaint filed in this matter, Case No. 2018 L 011219.

PRODUCTION REQUESTS

1. James and Kathy MacDonald's state and federal tax returns for the years 1995 through 2018.

2. The minutes of all Harvest Bible Chapel Elder meetings from 2008 to October, 2018.

3. Documents evidencing James and Kathy MacDonald's net worth.

4. The transaction documents associated with the transactions identified in the Complaint at paragraphs 24, 26, 27, 29, 31, 32, 39 and 46.

5. Documents evidencing James MacDonald's compensation and benefits for the years 1995 to 2018.

6. Communications between plaintiffs and Ms. Roys.

7. Communications, be they internal or external, about, concerning or mentioning Ms. Roys.

8. The video footage referred to in paragraph 130 of the Complaint.

9. An itemization of all salaries for all Harvest employees for the last ten (10) years.

10. Final financial statement for Walk in the Word when it ceased being a separate 501c3 and became a ministry of Harvest Bible Chapel.
11. Detailed financial statements for Walk in the Word from its inception to the present including all employee salaries.
12. Detailed financial statements for Harvest Bible Fellowship from its inception to the present, including all employee salaries.
13. Detailed financial statements for Vertical Church Worship since its inception to the present, including all salaries and royalties paid.
14. Detailed financial statements for Vertical Church Band since its inception to the present, including all salaries and royalties paid.
15. All contracts, both general contractor and subcontractors, as well as proof of payment (cancelled checks, money orders, receipts), for the construction and finishing of the home at [REDACTED], including all fees and permits paid for the house.
16. Documents evidencing money given by Harvest to [REDACTED] including documents showing services and timing of transactions.
17. Incorporation documents and financial records for all LLC's owned or partially owned by Harvest, including but not limited to assets, debts, obligations, investments, salaries, distributions.
18. Incorporation documents and financial records for all LLC's owned or partially owned by James and/or Kathy MacDonald including, but not limited to assets, debts, obligations, investments, salaries, distributions.
19. Lease agreements for building used by Harvest Bible Chapel Aurora.
20. Lease agreements for building used by Harvest Bible Chapel Deerfield.

21. All documents concerning the “conflicts of interest and issues of self-dealing” asserted in paragraph 68 of the lawsuit and the names of the referenced “three former elders.”

22. Documentation concerning the 5G Campaign and detailed financial information on how all the money raised in the campaign was spent.

23. All minutes of the Harvest Elder Executive Committee from its inception to the present.

24. All communications relating to the election of the Elder Executive Committee when it was first created.

25. All communications to and from James MacDonald’s official account and his secret email account [REDACTED] for the past ten (10) years.

26. All phone records and text messages to and from James MacDonald’s cell phone for the past ten (10) years concerning the matters asserted in the Complaint.

27. All expenses, fees, and salaries related to [REDACTED]
[REDACTED]
[REDACTED]

28. [REDACTED]
[REDACTED]

Dated: November 14, 2018.

Respectfully submitted:

By: Charles L. Philbrick
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DuPage Firm No.: 69400

Counsel for Defendant Julie Stern Roys

CERTIFICATE OF SERVICE

On November 14, 2018, I, Charles L. Philbrick, an attorney, certify that I caused to be served a copy of the foregoing Defendant Julie Stern Roys' Requests for Production to Plaintiffs on the following counsel of record via electronic mail:

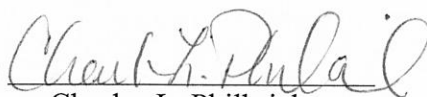
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Date: November 14, 2018

By:


Charles L. Philbrick