



TORT TRENDS

The newsletter of the Illinois State Bar Association's Section on Tort Law

Editor's note

By John L. Nisivaco, Boudreau & Nisivaco, Chicago

The first article of this edition is written by immediate past chair of the Tort Law Section Council, Tim Kelly. Mr. Kelly addresses the question of whether expert testimony is required to admit vehicle impact photographs. The article provides several case reviews and asserts that, although once up for debate, the standard for admissibility of vehicle impact photographs is now clear.

The second article, written by Thomas Keefe, III and Thomas Keefe, Jr., discusses a hospital's immunity from medical malpractice actions. The authors suggest a challenge to this defense with a two-prong approach focusing on the derivative nature of the hospital's immunity.

Thank you to all of the contributors. The articles are excellent and we hope you find the materials helpful. ■

Admissibility of vehicle impact photographs

By Timothy W. Kelly, Kelly Law Offices, Bloomington

The standard for the admissibility of photographs of a motor vehicle collision depicting minimal damage to the vehicles in a personal injury trial has been debated since the First District Appellate Court's opinion in *Dicosola v. Bowman*, 342 Ill. App. 3d 530 (1st Dist. 2003). In *Dicosola*, the trial court granted Plaintiff's Motion in *Limine* to exclude photographs depicting the apparent minimal damage to Plaintiff's post-collision vehicle and prohibited the defendant from arguing, without expert testimony, that a correlation existed between the amount of damage to the vehicle and the extent of Plaintiff's injuries. The defendant appealed, citing *Cancio v. White*, 297 Ill. App. 3d 422 (1998), in which the Appellate Court concluded that the admission of photographs of a vehicle was proper as they were relevant to the nature and extent of Plaintiff's damages. The court found they were relevant because they showed little or no damage, which is something the jury could consider in determining what, if any, injuries the Plaintiff sustained as a result of the accident. *Cancio* at 433.

However, *Cancio* did not state that such pho-

tographs are always or are automatically relevant and, although not explicitly stated, the court in *Cancio* acknowledged that the standard regarding the admissibility of photographs is within the trial court's discretion. *Cancio* did not require expert testimony before the photographic evidence was admissible; however, the Plaintiffs in *Cancio* had only argued that the photographs were irrelevant because liability was not an issue. The *Cancio* court was not presented with, nor did it consider, the issue of whether expert testimony should have been required with respect to the admissibility of the photographs.

The *Dicosola* court instead followed the reasoning of the Illinois Supreme Court in *Voykin v. DeBoer*, 192 Ill. 2d 49 (2000). In *Voykin*, the Court rejected the evidentiary rule known as "the same part of the body rule," which had essentially provided that if a plaintiff had previously suffered an injury to the same part of the body, then that previous injury would automatically be relevant to the present injury simply because it affected

Continued on page 2

INSIDE

Editor's note 1

Admissibility of vehicle impact photographs 1

Tort immunity in medical malpractice cases 3

Upcoming CLE programs .. 6



IF YOU'RE GETTING THIS NEWSLETTER BY POSTAL MAIL AND WOULD PREFER ELECTRONIC DELIVERY, JUST SEND AN E-MAIL TO ANN BOUCHER AT ABOUCHER@ISBA.ORG

Admissibility of vehicle impact photographs

Continued from page 1

the same part of the body. While finding that jurors are not skilled in the practice of medicine, the *Voykin* court held that if a defendant wished to introduce evidence that the plaintiff had suffered a prior injury, whether to the same part of the body or not, the defendant must introduce expert evidence demonstrating why the prior injury is relevant to causation, damages, or some other issue of consequence. However, the court went on to say that “this rule applies unless the trial court, in its discretion, determines that the nature of the prior and current injuries are such that a lay person can readily appraise the relationship, if any, between those injuries without expert assistance.”

The *Dicosola* court, in following *Voykin*, did not hold that expert testimony is always required for photographic damage evidence to be admissible. The court found only that the trial court in this case did not abuse its discretion by requiring expert testimony to show a correlation between the extent of the vehicular damage and the extent of Plaintiff’s injuries. Yet, in following *Voykin*, the implication was clear that expert testimony would be necessary if the issue was beyond the knowledge of an average juror. The defendant’s petition for leave to appeal was denied. (206 Ill. 2d 620 (2003)).

Following *Dicosola*, the Third District decided *Ferro v. Griffiths*, 351 Ill. App. 3d 738 (3rd Dist. 2005). *Ferro* also involved a vehicular collision in which the defendant attempted to present photographs of both vehicles to suggest a minor impact and dispute the severity of injuries to the plaintiff. The jury returned a verdict in favor of the defendant Griffith and Ferro appealed claiming that it was improper and highly prejudicial for the court to allow the defendant to offer into evidence photographs that showed little damage to either vehicle. Citing *Dicosola*, Ferro argued that expert testimony was required to show a correlation between the lack of damage to the vehicle and the injury to the plaintiff. In affirming the verdict for the defendant, the Appellate Court stated “when the trial court makes a decision to admit pictures, it has to determine whether the photographs make the resulting injury to the plaintiff more or less probable. The court must determine whether the nature of the

damage to the vehicles and the injury to the plaintiff are such that a lay person can readily assess the relationship, if any, without expert interpretation.” See *Voykin v. DeBoer*, 192 Ill. 2d 49 (2000). A reviewing court will not disturb the trial court’s decision absent a clear abuse of that discretion. An abuse of discretion occurs only where no reasonable person would take the position adopted by the trial court. *Taxman v. 1st Illinois Bank of Evanston*, 336 Ill. App. 3d 92 (2002).

Most recently, the Fifth District Appellate Court ruled on the same issue in *Fronabarger v. Burns*, 2008 Ill. App. Lexus 976 (5th Dist. 2008). In *Fronabarger*, the Appellate Court affirmed the trial court’s ruling allowing into evidence, without expert testimony, photographs of the parties’ vehicles following the collision. The defendant introduced two photographs of the defendant’s and two of the plaintiff’s cars following the accident. The photographs depicted no damage to the defendant’s car and minor damage to the plaintiff’s vehicle. Over Plaintiff’s objection, the photographs were admitted into evidence. Following their admission, the defendant presented the testimony of a board-certified neurologist who had reviewed the plaintiff’s medical records and conducted a physical and neurological examination of the plaintiff. Following her testimony on the issue of the plaintiff’s injuries, the physician was shown the photographs of the vehicles and opined that “if the vehicle doesn’t sustain any evidence of an impact, then it’s not likely that the people in the vehicle are going to have significant evidence of an impact.” In *Fronabarger*, the Appellate Court determined that “we cannot say that the trial court abused its discretion by admitting the photographs without expert testimony.”

The second prong of the plaintiff’s argument was that the trial court should not have allowed the defendant’s expert to testify that if the vehicle doesn’t sustain any evidence of an impact, then it’s not likely that the people in the vehicle would have significant evidence of an impact. The plaintiff argued that the defendant failed to lay a proper foundation because the physician was not qualified to give testimony regarding how the damage to vehicles related with injuries to the plaintiff. The Appellate Court rejected

the plaintiff’s foundation argument and held that the admissibility of expert testimony, like that of the photographs, is within the sound discretion of the trial court.

The general assembly has also reviewed this issue by introducing House bill 4899 in the 95th general assembly. House bill 4899 would amend the Code of Civil Procedure to provide, “that in any action concerning a motor vehicle accident in which personal injury or property damage is alleged, a photographic or electronic image of a motor vehicle or other property is relevant and admissible through a lay or a current witness with personal knowledge that the image truly and accurately portrays what it purports to portray.” The bill further provides that it is not necessary that an expert or opinion witness testify to the image’s relevancy or to the correlation between the image and the claimed injury. On March 14, 2008, the bill was re-referred to the rules committee.

Although many plaintiff practitioners since *Dicosola* have argued that expert testimony is required before photographic evidence of minimal damage to vehicles can be admitted at trial, it is now clear that such is not the standard. The standard is that the admission of such photographs is within the sound discretion of the trial court and will not be reversed absent an abuse of discretion. The trial court need only determine whether the photographs make the resulting injury to the plaintiff more or less probable and whether the nature of the damage to the vehicles and the injury to the plaintiff are such that a lay person could readily assess the relationship, if any, without expert interpretation. ■



ILLINOIS BAR
FOUNDATION

**Support the Illinois Bar
Foundation—the charitable
arm of your Association.**

**To receive an
application, call
1-800-252-8908.**

Tort immunity in medical malpractice cases

By Thomas Q. Keefe III, and Thomas Q. Keefe, Jr., Belleville

Plaintiff walks into a public hospital emergency room complaining of shortness of breath and chest pain. The on-call ER physician conducts a cursory exam and diagnoses indigestion without obtaining any history from plaintiff. Plaintiff is sent home and later that night he drops dead of a heart attack.

If the ER physician is an employee of a hospital, both are immune. Public entities and public employees are immune from allegations of failure to diagnose and misdiagnosis, as well as, allegations of failure to perform adequate exams (but not for improper treatment after diagnosis). 745 ILCS 10/6-105-06;¹ *Michigan Avenue National Bank v. County of Cook*, 191 Ill.2d 493 (2000). By contrast, if the ER physician is an independent contractor, he obviously enjoys no immunity. Moreover, to date, the hospital has remained immune (and unchallenged—at least in reported decisions).

But might this independent contractor-conferred immunity be ripe for a challenge? Such a challenge would be two-fold: (i) Construing the statute as defining the hospital's immunity as derived from its employees, as opposed to separately conferred, and (ii) demonstrating that the apparent agency relationship between the hospital and the independent contractor falls outside the policy contemplated by the statute.

There is ample evidence that immunity is merely derivative. Beginning with simple logic, a hospital can only be bound if an authorized individual undertakes an act on the hospital's behalf. This seems beyond obvious, but is useful in illustrating the following disconnect. While an individual can incur liability without likewise binding the hospital (e.g., in the case of an employee acting beyond the scope), a hospital can only incur liability if some individual also incurs liability. It seems counter-intuitive to separately award immunity to an entity when that entity cannot incur liability separately.

The statute tracks this logic. Both 6-105 and subsections (a) and (b) of 6-106, which focus on immunity, employ the correlative conjunctions "neither ... nor"; one is dependent on the other. By contrast, subsections (c) and (d) of 6-106, which focus on liability, simply use the coordinating conjunction "or"; although related, one does not depend on the other. Surely, the legislature would not

utilize different constructs for immunity and liability without reason.

That reason is that the clauses in the immunity sections are to be read in concert, while the liability clauses are to be read separately. In other words, while a hospital can be named under subparts (c) and (d) without naming the employee (or vice-versa), the hospital is only immune in situations where the employee is likewise immune. Accordingly, the hospital's immunity must be derived from the employee.

Further note that our legislature, well-versed in agency law, utilizes the phrasing "employee ... scope of his employment" instead of "agent ... scope of his agency." The purpose of this narrower formulation illustrates why hospitals are not immune for the failure of their apparent agents (i.e. the independent contractor) to examine and diagnose.

When an employee reports to the hospital, anything he does within the scope of his employment automatically binds the hospital. By contrast, when an independent contractor physician walks into a hospital, the entity remains protected. It is only when the hospital takes the affirmative step of holding him out and cloaking him with authority (making him their apparent agent) that they find themselves bound. In other words, by empowering those who could not otherwise bind them, the hospital has taken action beyond that contemplated by the plain language of 6-105. "Where the principal creates the appearance of authority, the principal 'will not be heard to deny the agency to the prejudice of an innocent party, who has been led to rely upon the appearance of authority in the agent.'" *Gilbert v. Sycamore Municipal Hospital*, 156 Ill.2d 511, 523-24 (1993) (internal citations omitted)(collecting cases).

The final argument is as follows: Because an individual must first act before a hospital acquires immunity, that immunity is derived from the individual. The conjunctive phrasing employed by the statute further supports this interpretation, as does the legislature's decision to only immunize "employees within the scope" as opposed to "agents within the scope." The creation of apparent agency requires an affirmative step by the hospital, whereas, the employee relationship is automatic. The legislature was aware of this distinction when crafting the statute, and if they

TORT TRENDS

Published at least four times per year.

Annual subscription rate for ISBA members: \$20.

To subscribe, visit www.isba.org or call 217-525-1760

OFFICE

Illinois Bar Center
424 S. Second Street
Springfield, IL 62701
Phones: 217-525-1760 OR 800-252-8908
www.isba.org

EDITOR

John L. Nisivaco
120 N. LaSalle St., Ste. 2850
Chicago, IL 60602

MANAGING EDITOR/ PRODUCTION

Katie Underwood
kunderwood@isba.org

TORT LAW SECTION COUNCIL

George G. Leynaud, Chair
Yvonne M. O'Connor, Vice Chair
Martin L. Glink, Secretary
Timothy W. Kelly, Ex-Officio

Dennis L. Berkbigler	Kenya A. Jenkins-Wright
Scott A. Berndtson	Ronald W. Kalish
Perry J. Browder	Mark L. Karno
Hon. Elizabeth M. Budzinski	Thomas Q. Keefe, III
David I. Cates	Scott D. Lane
William A. Cirignani	Timothy J. Londrigan
Josephine Cullotta	Dennis M. Lynch
Hon. Ronald S. Davis	Stacey E. Lynch
Albert E. Durkin	Hon. Thomas V. Lyons II
Karen M. Enright	Anthony J. Monaco
Robert D. Fink	Nicholas T. Motherway
Jeffrey D. Frederick	Kevin E. O'Reilly
Michael C. Funkey	Hon. Jeanne M. Reynolds
Kelley A. Gandurski	Bruno J. Tassone
Michael R. Hartigan	Kevin T. Veugeler
Keith A. Hebeisen	Daniel P. Wurl
	Patricia A. Zimmer

James F. McCluskey, Board Liaison
James J. Morici Jr., Board Co-Liaison
Lynne Davis, Staff Liaison
Timothy J. Londrigan, CLE Coordinator
J. Randall Cox, CLE Committee Liaison

Disclaimer: This newsletter is for subscribers' personal use only; redistribution is prohibited. Copyright Illinois State Bar Association. Statements or expressions of opinion appearing herein are those of the authors and not necessarily those of the Association or Editors, and likewise the publication of any advertisement is not to be construed as an endorsement of the product or service offered unless it is specifically stated in the ad that there is such approval or endorsement.

Articles are prepared as an educational service to members of ISBA. They should not be relied upon as a substitute for individual legal research.

The articles in this newsletter are not intended to be used and may not be relied on for penalty avoidance.

Postmaster: Please send address changes to the Illinois State Bar Association, 424 S. 2nd St., Springfield, IL 62701-1779.



Another
Policyholder
Dividend
for 2009!

CALL
ASAP

800-473-4722

www.isbamutual.com

wished hospitals to be immune from the negligence of their apparent agents, they very easily could have crafted the statute as such.

Although this argument is not an automatic winner, the challenge is certainly worth a shot. ■

1. Section 6-105 provides:

"Neither a local public entity nor a public employee acting within the scope of his employment is liable for injury caused by the failure to make a physical or mental examination, or to make an adequate physical or mental examination of any person for the purpose of determining whether such a person has a disease or physical or mental condition that would constitute a hazard to the health or safety of himself or others."

745 ILCS 10/6-105.

Section 6-106 provides:

(a) Neither a local public entity nor a public employee acting within the scope of his employment is liable for injury resulting from diagnosing or failing to diagnose that a person is afflicted with mental or physical illness or addiction or from failing to pre-

scribe for mental or physical illness or addiction.

(b) Neither a local public entity nor a public employee acting within the scope of his employment is liable for administering with due care the treatment prescribed for mental or physical illness or addiction.

(c) Nothing in this section exonerates a public employee who has undertaken to prescribe for mental or physical illness or addiction from the liability for injury proximately caused by his negligence or by his wrongful act in so prescribing or exonerates a local public entity whose employee, while acting in the scope of his employment, so causes such an injury.

(d) Nothing in this section exonerates a public employee from liability for injury proximately caused by his negligent or wrongful act or omission in administering any treatment prescribed for mental or physical illness or addiction or exonerates a local public entity whose employee, while acting in the scope of his employment, so causes such an injury.

745 ILCS 10/6-106.

Target your message!

- Reach the exact practice area you need with no wasted circulation
- Ads cost less
- ISBA newsletter readers ranked their newsletters 2nd highest of all Illinois legal publications in terms of usefulness. (Illinois Bar Journal was ranked 1st)
- 72% of newsletter subscribers either save or route each issue, so your ad will have staying power.

For more information contact:
Nancy Vonnahmen
Advertising Sales Coordinator
Illinois State Bar Association
800-252-8908 or 217-747-1437



A Not-So-Subtle Reminder To All ISBA Members:

You Have FREE Access To The Most Intuitive Online Legal Research In The Country - Today.



Log on to the Illinois State Bar Association website at www.isba.org and gain access to Fastcase's comprehensive online legal library for free. ISBA members can now save thousands of dollars on legal research costs by using Fastcase.

FREE to ISBA Members:

- U.S. Supreme Court Cases
- All Federal Circuit Courts
- Illinois-based Federal District Courts
- Illinois Supreme Court and Appellate Cases
- Illinois Statutes
- Illinois Administrative Regulations
- Supreme and Appellate Cases for all 50 states
- U.S. Code and Code of Federal Regulations
- State Statutes and Regulations - 50 States

ISBA Members can also upgrade to the Fastcase Premium Plan for \$195 per year and receive:

- All Federal District Courts
- All Federal Bankruptcy Courts

Fastcase is a member benefit of ISBA



Upcoming CLE programs

To register, go to www.isba.org/cle or call the ISBA registrar at 800-252-8908 or 217-525-1760.

February

Friday, 2/26/10 – Chicago, ISBA Regional Office—Countering Litigation Gamesmanship. Presented by the ISBA General Practice Solo & Small Firm Section, Co – Sponsored by the Federal Civil Practice Section. 9-5.

Friday, 2/26/10 – Webcast—Countering Litigation Gamesmanship. Presented by the ISBA General Practice Solo & Small Firm Section, Co – Sponsored by the Federal Civil Practice Section. 9-5

Friday, 2/26/10 – Bloomington, Holiday Inn & Suites—Second Amendment and Department of Corrections' Issues for Criminal Practitioners. Presented by the ISBA Criminal Justice Section. Cap 70. 9-3:45.

March

Tuesday, 3/2/10- Chicago, ISBA Regional Office—Partnership Law Update- 2010. Presented by the ISBA Corporation, Securities and Business Law Section. 11:45-2.

Wednesday, 3/03/10 – Webcast—Illinois' New Rules of Professional Conduct. Presented by the Illinois State Bar Association. 12-1.

Thursday, 3/04/10- Chicago, ISBA Regional Office—Family Law Skills—Practice Makes Perfect. Presented by the ISBA Family Law Section. 8:30-5.

Thursday, 3/04/10 – Webinar—Conducting Legal Research on Fastcase. Presented by the Illinois State Bar Association. *An exclusive member benefit provided by ISBA and ISBA Mutual. Register at: <<https://www1.gotomeeting.com/register/812110961>>. 12-1.

Friday, 3/05/10 – Chicago, ISBA Regional Office—Administrative Adjudication in the City of Chicago and other Municipalities. Presented by the ISBA Administrative Law Section; co-sponsored by the ISBA General Practice Section, Small Firm & Solo Section Council. 8:30-5:15.

Thursday, 3/11/10- Webcast—Bankruptcy: Tips from the Bench. Presented by the ISBA Commercial Banking and Bankruptcy Section. <<https://isba.fastcle.com/store/seminar/seminar.php?seminar=3562>>. 12-1.

Friday, 3/12/10- Springfield, Illinois Army National Guard—Legal Issues for the Military Law Attorney. Presented by the ISBA Military Law Section. 8-12:30.

Thursday, 3/18/10- Webcast—Collaboration Tools: Paperless Communication with Clients. Presented by the ISBA Legal Technology Section. <<https://isba.fastcle.com/store/seminar/seminar.php?seminar=3563>>. 12-1.

Friday, 3/19/10 – Chicago, ISBA Regional Office—Preparing for Trial and Preparing for Appeal. Presented by the ISBA Bench and Bar Section. 8:30 – 6:30.

Friday, 3/19/10- Chicago, ISBA Regional Office—Preparing for Appeal. Presented by the ISBA Bench and Bar Section. 1:00-5:30.

Friday, 3/26/10 – Chicago, ISBA Regional Office—Divorce, Deportation and Disciplinary Complaints: Avoiding Immigration Pitfalls in Family Law. Presented by the ISBA International and Immigration Law Section; Co-Sponsored by ISBA Family Law and the ISBA Human Rights Section. 9-1.

Friday, 3/26/10 – Rock Island, Holiday Inn—Illinois' New Rules of Professional Conduct. Presented by the Illinois State Bar Association. 8-12:30. Cap 125.

April

Thursday, 4/1/10 – Webinar—Advanced Research on FastCase. Presented by the Illinois State Bar Association. *An exclusive member benefit provided by ISBA and ISBA Mutual. Register at: <<https://www1.gotomeeting.com/register/458393744>>. 12-1.

Thursday, 4/8/10- Webcast—Durable Powers of Attorney. Presented by the ISBA. <<https://isba.fastcle.com/store/seminar/seminar.php?seminar=3564>>. 12-1.

Thursday, 4/8/10- Springfield, INB Building 307 E. Jackson—Key Issues in Local Government Law: A Look at FOIA, OMA, Elections and Attorney Conflicts. Presented by the ISBA Government Section. 12:30-4:45.

Thursday, 4/8/10- Chicago, ISBA Regional Office—Resolving Financial Issues in Family Law Cases. Presented by the ISBA Family Law Section. 8:30-4:30.

Friday, 4/9/10- Chicago, ISBA Regional Office—Civil Practice Update- 2010. Presented by the ISBA Civil Practice Section. 9-4.

Monday - Friday, 4/12/10 - 4/16/10 – Chicago, ISBA Regional Office—40 hour Mediation/Arbitration Training. Master Series Presented by the Illinois State Bar Association and the ISBA Alternative Dispute Resolution Section. 8:30-5:45 each day.

Friday, 4/16/10- Chicago, ISBA Regional Office—Legal Trends for Non-Techies: Topics, Trends, and Tips to Help Your Practice. Presented by the ISBA Committee on Legal Technology; co-sponsored by the ISBA Elder Law Section Council. 1-4:30 p.m.

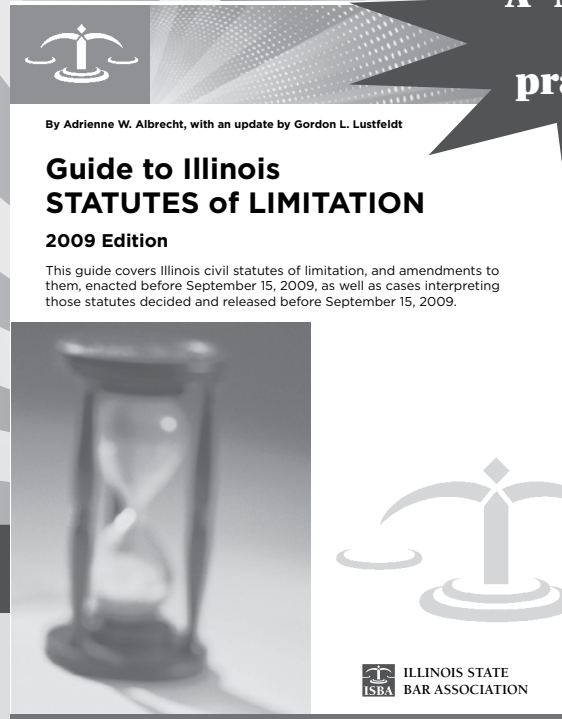
Saturday, 4/17/10 – Lombard, Lindner Learning Center—DUI, Traffic, and Secretary of State Related Issues- 2010. Presented by the ISBA Traffic Law Section. 9-4. Cap 250.

Tuesday, 4/20/10- Bloomington, Double Tree Hotel—Intellectual Property Counsel from Start-up to IPO. Presented by the ISBA Intellectual Property Section. 8:30-3:30. Cap 80.

Wednesday, 4/21/10- Bloomington, Double Tree Hotel—Construction Law—What's New in 2010? Presented by the ISBA Special Committee on Construction. 9-4. Cap 80.

Friday, 4/23/10- Champaign, I- Hotel and Conference Center—Practice Tips & Pointers on Child-Related Issues. Presented by the ISBA Child Law Section. 8:25-4. Cap 70. ■

Don't Miss This Easy-To-Use Reference Guide of Deadlines and Court Interpretations of Illinois Statutes



**A "MUST HAVE"
for civil
practitioners.**

Guide to ILLINOIS STATUTES OF LIMITATION

The new 2009 Guide is now available, containing Illinois civil statutes of limitation enacted and amended through September 2009, with annotations. Designed as a quick reference for practicing attorneys, it provides deadlines and court interpretations and a handy index listing statutes by Act, Code, or subject. Initially prepared by **Hon. Adrienne W. Albrecht** and updated by **Hon. Gordon L. Lustfeldt**.

Need it NOW?

Also available as one of ISBA's *FastBooks*. View or download a pdf immediately using a major credit card at the URL below.

FastBooks prices:

**Guide to Illinois
Statutes of Limitation**

\$32.50 Member/\$42.50 Non-Member

Order at www.isba.org/bookstore
or by calling Janice at 800-252-8908
or by emailing at jishmael@isba.org

Guide to Illinois Statutes of Limitation

\$35 Member/\$45 Non-Member
(includes tax and shipping)



Illinois has a history of
some pretty good lawyers.
We're out to keep it that way.

**Interview Your
Clients the
Easy Way!**

ILLINOIS CLIENT INTERVIEW FORMS

New and improved forms to help keep you focused while interviewing new clients. Add to or delete information from the forms so that they conform to your personal choice of interview questions. Use them on your computer while interviewing, or print them out before the interview. This is the Third Edition of these forms which have been revised in accordance with suggestions from attorneys who have used our old forms. There are 28 basic forms covering family law, estates and wills, real estate, incorporation, DUI, power of attorney, personal injury, and other subjects. A valuable tool for any attorney, keeping your client files uniform.

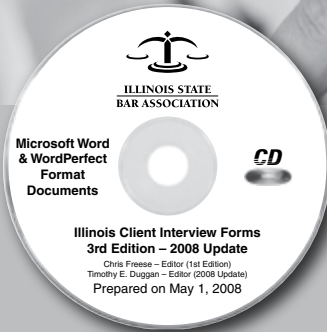
Forms are available on a compact disc (compatible with Word or Word Perfect). Compiled by members of the ISBA General Practice Section Council, and edited by Timothy E. Duggan. \$25 members/\$35 nonmembers.

Need it NOW?

Also available as one of ISBA's *FastBooks*.
View or download a pdf immediately using
a major credit card at the URL below.

FastBooks prices:

Illinois Client Interview Forms
\$22.50 Members/\$32.50 Non-Members



Order at www.isba.org/bookstore or by calling
Janice at 800-252-8908

Illinois Client Interview Forms
\$25 Member/\$35 Non-Member
(includes tax and shipping)



Illinois has a history of
some pretty good lawyers.
We're out to keep it that way.



Non-Profit Org.
U.S. POSTAGE
PAID
Springfield, Ill.
Permit No. 820

TORT LAW
ILLINOIS BAR CENTER
SPRINGFIELD, ILLINOIS 62701-1779
FEBRUARY 2010
VOL. 45 NO. 4