



April 3, 2020

Judge James P. Flannery
Presiding Judge, Law Division
Circuit Court of Cook County
Richard J. Daley Center
50 West Washington Street, Room 2005
Chicago, IL 60602

VIA EMAIL - james.flannery@cookcountyil.gov

Dear Judge Flannery:

On behalf of the physicians, residents and medical students of Illinois, we join the various health care systems who have requested that temporary restrictions on discovery in Cook County Law Division civil cases be instituted during the COVID-19 pandemic. On March 9, 2020 the Governor of Illinois declared all counties a disaster area because of the COVID-19 pandemic. On April 1, 2020, the Governor of Illinois executed an Executive Order which states in part "I direct all Health Care Facilities, Health Care Professionals, and Health Care Volunteers ... to render assistance in support of the State's response to the disaster recognized by the Gubernatorial Disaster Proclamation (COVID-19 outbreak)." [Executive Order 2020-19, Section 2]

We implore this Court to exercise its authority under Supreme Court Rule 201(c) (1) and order the postponement of the depositions of all health care professionals and providers and their employees for at least 90 days or when the Governor lifts emergency restrictions, whichever occurs first.

The Governor's extraordinary action of directing health care professionals and providers to render assistance reflects the gravity of the current situation. Health care professionals and providers taking time out of these critical lifesaving efforts to participate in in depositions endangers the citizens of this State.

As our hospital colleagues stated, we simply seek to remove obstacles between caregivers and patient care as all hospitals throughout the county and the state prepare to care for an influx of patients who will be diagnosed with a disease the world has never seen. While uncertainty looms as to the depth and duration of this health care emergency, one thing is certain: all health care professionals, providers, and those who support them must be available to devote their full attention and energy to caring for patients diagnosed with

COVID-19, as well as to treating those patients who suffer from other illnesses and require immediate attention. At this moment and for the foreseeable future, the situation in Cook County hospitals and medical offices is and will be “all hands on deck,” and that means not only physicians and nurses, but also employees who support the hands-on providers.

Additionally, this request aims to protect the health of all individuals involved in the civil justice system stemming the spread of COVID-19. We understand that the system is critical to the protection of the citizens as well. However, during this pandemic, we respectfully request these restrictions be in place for the overall health, welfare and safety of the citizens.

Thank you for your attention to this matter. If you have any questions, please contact Robert Kane at 312-580-2477.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard C. Anderson". The signature is fluid and cursive, with the first name "Richard" and last name "Anderson" clearly distinguishable.

Richard C. Anderson, M.D.
Chair, Board of Trustees
Illinois State Medical Society

cc: Paul E. Pedersen, M.D.
Robert W. Panton, M.D.
Alexander R. Lerner