

**From:** [Thomas Plouff](#)  
**To:** [Amy Bowne](#)  
**Subject:** Rule 218 proposal  
**Date:** Tuesday, April 30, 2019 3:43:05 PM

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Mr. Bowne, I have been practicing for almost 40 years, fifteen with the U.S. Government, nine as an Assistant United States Attorney, and twenty- five as a Plaintiff's personal injury attorney in Illinois. There is no valid reason to require my personal injury clients to waive their right of privacy. The only waiver should be on the medical conditions at issue. The threat of an insurance company having access to every private detail of a person's medical history, including intimate details of one's life, is uncalled for and intimidating to clients. Simple authorizations by the client, and subpoenas, would be fair for everyone. Why should the defense bar or insurance companies be given unfettered access to all medical records based upon a case involving a broken finger? This proposal is unnecessary and does not do justice between the parties. Please note my objection for the record.

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