



T Kost <tkost999@gmail.com>

Final reply for motion to exclude: our work product

11 messages

T Kost <tkost999@gmail.com>
To: Paul Dulberg <Paul_Dulberg@comcast.net>

Sat, Dec 10, 2022 at 11:44 AM

A thread to deal with our next "meat and potatoes" issue.

The attached files and folders are:

Dulberg amended motion to exclude...

Flynn's reply to amended motion to exclude...

A zipped folder of emails and documents we will release from attorney-client privilege for our final reply.

 [documents_to_release_from_attorney_client_privi...](#)

2 attachments**Filed Plaintiff's 2nd Amended Motion To Exclude CC-Civil - 2017LA000377 - 11_23_2022 - - - MOT - -.pdf**
2087K**Defendants_ Response to Plaintiff_s 2nd Amended Motion to Exclude the Deposition of Hans Mast-2.PDF**
1372K

T Kost <tkost999@gmail.com>
To: Paul Dulberg <pdulberg@icloud.com>

Sat, Dec 10, 2022 at 11:52 AM

[Quoted text hidden]

2 attachments**Filed Plaintiff's 2nd Amended Motion To Exclude CC-Civil - 2017LA000377 - 11_23_2022 - - - MOT - -.pdf**
2087K**Defendants_ Response to Plaintiff_s 2nd Amended Motion to Exclude the Deposition of Hans Mast-2.PDF**
1372K

T Kost <tkost999@gmail.com>
To: Paul Dulberg <pdulberg@icloud.com>

Sun, Dec 11, 2022 at 9:44 AM

These are the files in "To_Julia". one folder in "To Julia" called "Lawyers emails by date" that i am not attaching here because you already have a copy of it.

[Quoted text hidden]

6 attachments**_READ_ME.txt**
5K

-  **ddd_table_of_contents.txt**
5K
-  **missing_files.txt**
3K
-  **pop_table_of_contents.txt**
6K
-  **questions_for_mast.txt**
10K
-  **timeline_of_mcguire_settlement.txt**
14K

T Kost <tkost999@gmail.com>
To: Paul Dulberg <pdulberg@icloud.com>

Sun, Dec 11, 2022 at 9:52 AM

 **Lawyers Emails by date.zip**

[Quoted text hidden]

T Kost <tkost999@gmail.com>
To: Paul Dulberg <pdulberg@icloud.com>

Sun, Dec 11, 2022 at 11:14 AM

The attached text file is a "secret weapon" tool that we will use between ourselves and we will discuss later today.

This document will not be shared with Alphonse until it is ready and Alphonse is ready for it.

[Quoted text hidden]

-
-  **ARDC_Complaint_against_Williams_draft.txt**
46K

T Kost <tkost999@gmail.com>
To: Paul Dulberg <pdulberg@icloud.com>

Mon, Dec 12, 2022 at 2:07 AM

updated and better "ARDC_complaint" attached

[Quoted text hidden]

-
-  **ARDC_Complaint_against_Williams_draft.txt**
56K

T Kost <tkost999@gmail.com>
To: Paul Dulberg <pdulberg@icloud.com>

Mon, Dec 12, 2022 at 1:06 PM

Newest, most accurate version attached

[Quoted text hidden]

-
-  **Civil_and_ARDC_Complaint_against_Williams_draft.txt**
57K

T Kost <tkost999@gmail.com>
To: Paul Dulberg <pdulberg@icloud.com>

Wed, Dec 14, 2022 at 3:18 PM

Newest version attached. I am pretty close to finished on my end

[Quoted text hidden]

 **Civil_and_ARDC_Complaint_against_Williams_draft.txt**
86K

Paul Dulberg <pdulberg@icloud.com>
To: Tom Kost <tkost999@gmail.com>

Wed, Dec 14, 2022 at 5:29 PM

I did not get your finished version.

I have to get Moms groceries and won't be home to check email for approximately 2 hours

Resend latest version to:
Paul_Dulberg@comcast.net

[Quoted text hidden]

[Quoted text hidden]

<Civil_and_ARDC_Complaint_against_Williams_draft.txt>

T Kost <tkost999@gmail.com>
To: Paul Dulberg <pdulberg@icloud.com>

Wed, Dec 14, 2022 at 6:12 PM

[Quoted text hidden]

 **Civil_and_ARDC_Complaint_against_Williams_draft.txt**
86K

Paul Dulberg <pdulberg@icloud.com>
To: Tom Kost <tkost999@gmail.com>

Thu, Dec 15, 2022 at 7:44 AM

On Dec 14, 2022, at 6:12 PM, T Kost <tkost999@gmail.com> wrote:

On Wed, Dec 14, 2022 at 3:18 PM T Kost <tkost999@gmail.com> wrote:

Newest version attached. I am pretty close to finished on my end

On Mon, Dec 12, 2022 at 1:06 PM T Kost <tkost999@gmail.com> wrote:

Newest, most accurate version attached

On Mon, Dec 12, 2022 at 2:07 AM T Kost <tkost999@gmail.com> wrote:

updated and better "ARDC_complaint" attached

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 **Lawyers Emails by date.zip**

On Sun, Dec 11, 2022 at 9:44 AM T Kost <tkost999@gmail.com> wrote:

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On Sat, Dec 10, 2022 at 11:52 AM T Kost <tkost999@gmail.com> wrote:

----- Forwarded message -----

From: **T Kost** <tkost999@gmail.com>

Date: Sat, Dec 10, 2022 at 11:44 AM

Subject: Final reply for motion to exclude: our work product

To: Paul Dulberg <Paul_Dulberg@comcast.net>

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<Civil_and_ARDC_Complaint_against_Williams_draft.txt>



2022-12-15_Draft_Civil_and_ARDC_Complaint_against_Williams_draft copy.txt

87K