

Date : 12/14/2020 9:25:58 AM
From : "Paul Dulberg"
To : "Alphonse Talarico"
BCc : "Paul Dulberg"
Subject : Status of 17LA000377

Dear Mr Talarico,

Is there anything I should be doing or do you have the Defenses motion to compel handled?

We should discuss the following:

1. Whether or not to amend the complaint and add the October 22, 2013 Mast offer to McGuires, Mast memos, as well as the removal of the time stamp from the pharmacy receipts
2. File our own motion to compel for the missing insurance policies from the defenses document disclosure
3. Whether or not you want to amend our agreement to a fee contingent, keep it the same or move to some sort of hybrid of the two
4. Hire an expert witness

Thank you again,
Paul

Paul Dulberg
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