

Date : 12/19/2020 10:02:42 AM
From : "Alphonse Talarico"
To : "Paul Dulberg"
Subject : Re: Status of 17LA000377

Dear Mr. Dulberg,

My illness has converted from a serious diagnosis to the most serious diagnosis facing all in the USA.

I have been quarantined twice now within a week but I believe I will be back working on your case within 14 days.

I have been in contact with opposing attorney Flynn who has agreed to an additional 14 days on all aspects of the briefing schedule and I will be drafting an agreed order so that the Judge's permission will be obtained.

Sincerely,

Alphonse A. Talarico Esq.

From: Paul Dulberg <Paul_Dulberg@comcast.net>

Sent: Monday, December 14, 2020 1:04 PM

To: Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>

Subject: Re: Status of 17LA000377

Dear Alphonse,

I'm sorry to hear about the pneumonia.

Please take the time needed to get yourself healthy.

Sincerely,

Paul

On Dec 14, 2020, at 12:17 PM, Alphonse Talarico
<contact@lawofficeofalphonsetalarico.com> wrote:

Dear Mr. Dulberg ,

I have been working on our response to the motion to compel and I can assure you that it is being properly handled.

As to your questions 1-4 included I would like a discussion on those after our filing date of December 22, 2020.

The reason is I am currently under doctor's care and quarantined at home.

It is an unusual statement that would only be true in a totally unique year but happily I only have pneumonia and not Covid-19.

I have had numerous Covid -19 tests within the last two weeks and all were negative, so a determination that I only have pneumonia is very positive in 2020.

I will take bed rest for a few days but we will be in contact later this week.

Sincerely,

Alphonse A. Talarico, Esq.

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From: Paul Dulberg <Paul_Dulberg@comcast.net>

Sent: Monday, December 14, 2020 9:25 AM

To: Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>

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
847-497-4250