

Date : 6/11/2021 12:00:44 PM

From : "Paul Dulberg"

To : "Law Office Of Alphonse Talarico"

BCc : "Paul Dulberg"

Subject : Re: Your suggested amendment to the Amended Additional Answer to Hans Mast's Interrogatory #1

Dear Mr Talarico,

I forgot to add this when we spoke on the phone.

If for some reason the Judge tries to close document discovery on the 14th there are still documents we are owed.

Off the top of my head is the actual malpractice insurance policy since the only thing we have is the declaration pages.

Please ask that document discovery remain open till we receive the full insurance policies of the defendants.

Thank you,
Paul

On Jun 11, 2021, at 11:46 AM, Alphonse Talarico
<contact@lawofficeofalphonsetalarico.com> wrote:

Response completed orally today with client.

□

From: Paul Dulberg <Paul_Dulberg@comcast.net>

Sent: Friday, June 11, 2021 8:30 AM

To: Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>

Subject: Re: Your suggested amendment to the Amended Additional Answer to Hans Mast's Interrogatory #1

Dear Mr Talarico,

I wanted to touch base before court on the 14th.

Please take a moment to let me know what is needed to be done next after the 14th court date.
Ex. What will be the next item we need to tackle and how much time will ask the court to prepare?
Etc...

I know nothing is set in stone and that everything can change depending on what happens in court,

I am just trying to get a general idea or outline of what we most likely will be needing to do and how long we typically would have to do it.

Once again, Thank You for all the work you are doing on my behalf.

Sincerely,
Paul

On Jun 1, 2021, at 9:13 AM, Paul Dulberg <Paul_Dulberg@comcast.net> wrote:

Dear Mr Talarico,

Please find the attached file named 2021-06-01_Amended Response to Defendant Hans Mast Interrogatory #1_Signed.pdf

Thank you,
Paul

<2021-06-01_Amended Response to Defendant Hans Mast Interrogatory #1_Signed.pdf>

On Jun 1, 2021, at 8:38 AM, Alphonse Talarico
<contact@lawofficeofalphonsetalarico.com> wrote:

Dear Mr. Dulberg,

I have added your suggested statement to our Amended Additional Answer.

Please note that my responses were in accordance with the Judge's order of April 1, 2021, but your additional language is well founded.

Please review, call with questions, sign and return as I must serve these discovery documents today.

your anticipated cooperation is greatly appreciated,
Alphonse A. Talarico

<Amended Response to Defendant Hans Mast Interrogatory #1.docx>