

Date : 8/16/2021 9:56:14 AM
From : "Paul Dulberg"
To : "Law Office Of Alphonse Talarico"
BCc : "Paul Dulberg"
Subject : Re: Response to request to Admit

Per our phone conversation this morning,

I am denying the December 31, 2014 meeting.

This date makes no sense to me at all from what I remember when I learned his name for the first time to when I sent my first email to Saul Ferris after the meeting.

Like I said the December 31st date makes no sense based on memory and the only documents I have so I am definitely denying that it occurred on December 31, 2014.

On top of that, you are correct, it was New Years eve and having to spend the holiday in an attorneys office is something I wouldn't forget if it happened.

My apologies, the new date was a typo, not sure what I was thinking at the moment but it should have been December 31 not December 26. My bad.

The time frame of February 2014 to March 2015 was in reference to the first time Mast told me to seek new counsel till his withdrawal from the case. It was not in reference to when I met with Saul Ferris.

No, I do not believe we need to change our answers.

Hope this helps.

Paul

On Aug 16, 2021, at 7:18 AM, Alphonse Talarico
<contact@lawofficeofalphonsetalarico.com> wrote:

Dear Mr. Dulberg,

To be clear you denied meeting with saul Ferris on December 31, 2014 (New Year's eve).

Your letter speaks of a new date, that being December 26, 2014, so I would like a clarification as to why you used that date.

Additionally, there is a new time frame that being February of 2014- March of 2015. Please explain why this period is referenced.

are you requesting that I change any of your stated and signed answers ?

Alphonse A. Talarico

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From: Paul Dulberg <Paul_Dulberg@comcast.net>
Sent: Monday, August 16, 2021 6:01 AM
To: Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>
Subject: Re: Response to request to Admit

Dear Mr. Talarico,

Please find the attached file named 2021-08-16_Plaintiff Response to Defendants request for admissions of fact and genuineness of document.pdf

It is signed.

2021-08-16_Plaintiff Response to Defendants request for admissions of fact and genuineness of document.pdf has been processed through Adobe OCR (Optical Character Recognition) so that it meets the requirement that all PDF's be searchable.

Per our discussion I will mail the signed paper version to your office today.

I want to take note here that the December 26th, 2014, date listed in the Saul Ferris document is suspect but as we discussed, I cannot pin down the date that I met with Saul Ferris as I have no independent recollection of the date. I believe the meeting was between February 23, 2015 and March 6, 2015 based on refreshing my memory from emails and when I believe I first learned of his name but am not 100 percent certain, as we discussed, I contacted a lot of attorney's during the time Mast/Popovich were suggesting that I find new counsel some of them more than once because I did not keep a list of those I had previously contacted and forgot that I had already contacted some earlier and contacted them again. It is possible that I contacted Saul Ferris earlier than February 23rd but unlikely as most attorneys I contacted a second time by accident usually said you already spoke with us and I do not recollect Saul Ferris commenting that I had spoken to him earlier.

I don't think it matters but I wanted a note that I am not 100% certain because I know I did make the mistake of contacting several firms more than once by accident over the, I think it was thirteen months, time span since Mast/Popovich first told me to find new counsel and they finally withdrew from the case. I believe it was February of 2014 - March of 2015 time span that Mast/Popovich first suggested finding new counsel and then withdrawing from the case.

Thank you for all the work you did on this to date,
Paul

On Aug 15, 2021, at 11:05 PM, Alphonse Talarico
<contact@lawofficeofalphonsetalarico.com> wrote:

Please see the attached.

Alphonse A. Talarico

<Plaintiff's Responses to Defendant's Request to Admit.pdf><Response to Defendant Popovich's Request To Admit.doc>