

Date : 10/11/2021 2:27:17 PM
From : "Paul Dulberg"
To : "Alphonse Talarico"
BCc : "Paul Dulberg"
Subject : Ferris deposition and subpoena

Dear Mr Talarico,

Per our discussion on the phone earlier.

I know we discussed this on the phone and I said I was not going to send an email but I decided to anyway.

Information needed to Subpoena US Postal Service records for any and all certified mail between Ferris, Thompson & Zweig, LTD and The Law Offices of Thomas J. Popovich P.C.

From:
108 S. Greenleaf Avenue, Suite G
Gurnee, Illinois 60081

To:
3416 W. Elm Street
McHenry, Illinois 60050

Date Range:
February 22, 2015 to March 8, 2015

Notes:

First, We know this was signed for on March 7, 2015 from (Dulberg 002820) so this date range should cover what we are looking for.

Second, (Dulberg 002820) or the Saul Ferris letter is addressed to Mr Paul Dulberg but addressed to 3416 W. Elm Street McHenry, Illinois 60050 which is the address of The Law Offices of Thomas J. Popovich P.C.

Third, My best guesses as to how I came in possession of this letter since it was not itemized to Mr Balke on May 8, 2015 in (Dulberg 002639) when I picked up the documents wrongly sent to 3416 W. Elm Street McHenry, Illinois 60050 from Ferris, Thompson & Zweig, LTD sent in early March of 2015 are as follows:

A.) It was in what I refer to as the "brown box file" which is the mixed up case file that was missing chunks of documents and depositions Brad Balke received from Mast confirmed in (Dulberg 002821) But I did not personally see this version of the case file until after Balke withdrew as counsel and without looking it up was I think in July of 2015.

B.) It was in what I refer to as "the Brown Jacket File" which my Brother Scott Dulberg signed for at the Popovich Firm which I believe happened in either August or September of 2015 and was almost immediately turned over to the Boudin firm. This is from memory and I need more time to confirm the dates.

C.) The Popovich firm mailed the Saul Ferris letter to me via regular us mail. Not sure when this could have happened but I do know if this is how I got it, it came long after I picked up the rest of the legal documents from Mr Ferris' office back on May 8, 2015.

Fourth, It would not surprise me if this letter does not match any letter Mr Ferris may produce because it is highly likely Mast used the letter from Ferris, changed the information within the letter. Particularly the dates, and found a way to slip it to or in Dulberg's documents because in a fit of anger Dulberg threatened a lawsuit in March of 2015 if Dulberg found any way that Mast screwed this case up and Mast needed the statute of limitations clock to start

ticking for exactly the situation we are in today.

This deposition and any documentation Ferris produces should answer this question.

Paul