

Date : 11/4/2021 10:07:29 AM
From : "Paul Dulberg"
To : "Law Office Of Alphonse Talarico"
BCc : "Paul Dulberg"
Subject : Re: Dulberg v Mast et al. Discovery Requests
Dear Mr Talarico,

I have a final thought/question on this topic:

Did Mr Gooch file with the clerk and send the discovery requests to the defense prematurely?

In other words, did the judge give Gooch the go-ahead to start the discovery process before the complaint was accepted?

Hope to hear from you soon,
Paul

On Nov 4, 2021, at 9:28 AM, Paul Dulberg <Paul_Dulberg@comcast.net> wrote:

Dear Mr Talarico,

Below is a forwarded copy of the email I received from Julia Williams at the Clinton firm.

Attached are the discovery requests.

It shows that the Clinton firm sent the defense counsel, Mr Flynn, the discovery requests on March 22, 2019.

I was not provided a separate proof of service with this email and I cannot find one filed with the clerk the clerk.

I did find a filing with the clerk on March 22, 2019 but it from the defense counsel to the plaintiff for discovery requests.

I think this answers the question in my previous email "if this May 29, 2019 response is to the Clinton's discovery requests or the Gooch discovery requests" as the response is to the Clinton discovery requests.

So to sum up what I have found:

Gooch's discovery requests were filed properly but ignored by defense counsel.
Clinton's discovery requests were not filed with the clerk yet were answered by defense counsel.

Give me a call to discuss how to clean up this mess left by precious counsel.

Thanks,
Paul

Begin forwarded message:

From: Julia Williams <juliawilliams@clintonlaw.net>
Subject: Fwd: Dulberg v Mast et al. Discovery Requests
Date: March 22, 2019 at 11:34:24 AM CDT
To: PAUL DULBERG <paul_dulberg@comcast.net>, Mary Winch
<marywinch@clintonlaw.net>, Ed Clinton <ed@clintonlaw.net>

Dear Paul,
Attached please find the discovery requests we sent to opposing counsel today.

Best Regards,
Julia Williams
Of Counsel
The Clinton Law Firm
111 W. Washington, Ste. 1437
Chicago, IL 60602
P: 312.357.1515
F: 312.201.0737
juliawilliams@clintonlaw.net

This message may be privileged and confidential. If you are not the intended recipient, please delete the email and notify the sender immediately.

<Dulberg 213 interrogatories 2019 Mar 22.pdf>
<Dulberg 213 f interrogatories 2019 Mar 22.pdf>
<Dulberg 214 Doc Requests 2019 Mar 22.pdf>