

Date : 1/3/2022 8:31:52 AM
From : "Paul Dulberg"
To : "Alphonse Talarico"
BCc : "Paul Dulberg"
Subject : Gooch discovery vs Clinton discovery

Dear Mr Talarico,

Per our phone conversation regarding the Gooch Discovery definition issues;

Definition #2 - the term in bold font "DEFENDANTS" - Could mean "THE LAW OFFICES OF THOMAS J. POPOVICH P.C. and HANS MAST" or it could mean The McGuires and Gagnon or all parties combined.

2 key terms that are ambiguous are:

"Other clients"

"Defendants"

I can only speculate that this is looking for possible conflicts of interest and in that context "DEFENDANTS" would seem best to fit all parties.

Definition #5 - "in preparation of the prenuptial agreement" vs "in preparation of any documents, hearings, or settlement negotiations" on its face appears to be a typo but I can only speculate why Gooch would want this term used.

Definition #17 - "DULBERG" vs "THE LAW OFFICES OF THOMAS J. POPOVICH P.C. and HANS MAST" on its face appears to be a typo however I can only speculate why Gooch would use the term.

If the defense wishes to depose Gooch over his meanings of these terms that's okay by me.

My speculation is that Mr Gooch simply rushed these out before withdrawing and did not polish the work.

Gooch interrogatories that stand out to me and I would like answered because There is no equivalent in the Clinton discovery to any of these and these were properly filed with the court:

#2

#3

#4

#5

#6

#9

#10

#11

#13

#14

#15
#16
#17

Gooch Request for production that stand out to me and I would like answered because there is no equivalent in the Clinton Request.

#1
#3
#9
#10

I noticed that neither the Clinton Request for production nor the Defenses response are part of the Reply filed CC-Civil - 17LA000377 - 12_22_2021 - - - RELP - -.pdf file.

Thank you,
Paul