

Date : 1/16/2022 9:46:19 AM

From : "Paul Dulberg"

To : "Alphonse Talarico"

BCc : "Paul Dulberg" , "Tom Kost"

Subject : Fwd: Court Reminders: 17LA000377 has an event coming up tomorrow.

Dear Mr Talarico,

Julia Williams in this email states;

"the court is permitting us to move forward with discovery"

"We will be sending out new discovery requests by the deadline set by the court"

These are deceiving statements and suggests that the court at some point stopped prior discovery and is now setting a deadline for new discovery.

As you know from all the reports of proceedings and the court orders that Julia Williams statements in this email are at best deceiving and simply untrue.

Thank You,
Paul

Begin forwarded message:

From: Julia Williams <juliawilliams@clintonlaw.net>

Subject: Re: Court Reminders: 17LA000377 has an event coming up tomorrow.

Date: February 26, 2019 at 5:04:30 PM CST

To: Paul Dulberg <Paul.Dulberg@comcast.net>

Cc: Ed Clinton <ed@clintonlaw.net>, Mary Winch <marywinch@clintonlaw.net>

Dear Paul,

The Defendant has not filed any responsive pleading to our amended complaint.

Therefore, the Judge has not made any ruling as it related to our complaint.

Opposing counsel indicated that they would simply answer and file affirmative defenses. This means that they will file an "Answer" that either admits or denies each of the allegations in the amended complaint. They will also be listing some of their defenses to the case that include the statute of limitations argument. There are certain defenses that they do not have to list that relate directly to our allegations. I will explain in more detail when we see their response.

As for the discovery, the court is permitting us to move forward with discovery while we are waiting for their response. We will be sending out new discovery requests by the deadline set by the court.

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.

On Feb 25, 2019, at 5:14 PM, Paul Dulberg
<Paul_Dulberg@comcast.net> wrote:

Hi Julia,

Thank you for coming to court today.

I am a bit confused, as I understand it Mr. Flynn has 14 days to respond to the complaint but after that we start the discovery process with our next court date May 30th.

Does this mean the court has accepted the complaint as valid and is allowing us to move forward?

Also, I am formulating some questions per our conversation after court pertaining to 26(b)(3) - work product doctrine.

I don't believe their information is protected from discovery by us for several reasons.

These are rough and will be added to and refined over the next few weeks.

1. Their "Work Product" was being done under contract for me. I don't believe this doctrine was designed to protect the "Work Product" from the one their doing the work for.

2. The "Work Product" is protected when it is used for preparing litigation or trial purposes. But that's not what happened. The firm intentionally dropped the case. On its face this shows the firm had no intention for the "Work Product" to be used in litigation or at trial.

3. The business decision to drop the McGuires from the case was a "business decision" made by the firm and not part of the "Work Product" for litigation or trial purposes therefore it seems it's outside the "Work Product" protections.

4. I have a right to any and all notes, etc... pertaining to conversations between myself and the Popovich firm. Those notes are of my statements not their "Work Product". If they have documents with my statements I am entitled to copies.

Those are just for starters, I will be studying all I can on this subject and will try to be ready if the defense decides to hide behind the "Work Product" doctrine and hide turning over any and all materials relevant to this case.

Once again;

Thank you,

Paul

On Feb 25, 2019, at 4:17 PM, Julia Williams
<juliawilliams@clintonlaw.net> wrote:

Dear Paul,
Per our discussion today, George Flynn for the Defendants
went to a new firm so this allows the substitution of the
firms.
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

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not the intended recipient, please delete the email
and notify the sender immediately.

On Feb 24, 2019, at 10:03 AM, Paul Dulberg
<Paul_Dulberg@comcast.net> wrote:

Hi Julia,
Below is an automated reminder from
McHenry County Circuit Clerk.
The second event listed for 2/25/2019 is a
MOTION - WITHDRAW
Who is filing to a motion to withdraw?
Thanks,
Paul

Begin forwarded message:

From: McHenry County Circuit
Clerk
<[mchenrycircuitclerk@circuitclerk
ofmchenrycounty.org](mailto:mchenrycircuitclerk@circuitclerk
ofmchenrycounty.org)>
**Subject: Court Reminders:
17LA000377 has an event
coming up tomorrow.**

Date: February 24, 2019 at
6:03:38 AM CST

To:

<Paul_Dulberg@comcast.net>



17LA000377 

DULBERG, PAUL VS MAST, HANS, ET AL

This case has an event coming up *tomorrow*.

COURT EVENT INFORMATION

02/25/2019	9:00 AM	Courtroom 201	MOTION - DEFAULT
02/25/2019	9:00 AM	Courtroom 201	MOTION - WITHDRAW
02/25/2019	9:00 AM	Courtroom 201	STATUS - CHECK

NOTE: Please do not reply to this message, as this account is not monitored. For more information, please visit the court's website at www.McHenryCircuitClerk.org.

To Unsubscribe to Court Event Reminders for 17LA000377, click here: [unsubscribe](#).

End of Message