

Date : 7/15/2022 10:01:05 AM

From : "Paul Dulberg"

To : "Law Office Of Alphonse Talarico"

BCc : "Paul Dulberg" , "Tom Kost"

Subject : Re: 7 Subpoenas to answer questions about Hans Mist Exhibit 12

Another person I would love to add to our subpoena list is Mr Flynn since he admits to passing Hans Mist Exhibit 12 and has other emails with US legal support and Julia Williams that we don't have.

Are we allowed to subpoena Mr Flynn's communications with any and all the people previously listed including any communication with Barbara Smith?

If so then I want his communications and documents as well.

I don't believe he can claim privilege since it is not communications with his clients

> On Jul 15, 2022, at 9:54 AM, Paul Dulberg <Paul_Dulberg@comcast.net> wrote:

>

> Dear Mr Talarico,

>

> Below are the 7 entities/people I think we need to subpoena:

>

> US Legal Support

> Noelle Kappes

> William Tolliver

>

> The Clinton Law Firm

> Julia Williams - juliawilliams@clintonlaw.net

> Ed Clinton

> Mary Winch

>

> I did not add Barbara Smith because we already subpoenaed her.

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> If you think we need to subpoena anyone else let me know.

>

> Thank you

> Paul