

Date : 8/26/2022 4:16:42 PM

From : "Paul Dulberg"

To : "Law Office Of Alphonse Talarico"

BCc : "Paul Dulberg"

Subject : Re: Anomalies in June 2012 Mast Discovery Package sent to Barch

Barch document page number Correction below:

2012-06-27 Mast Discovery to McGuires 5 of 5:

...

Barch Documents:

Dulberg Master File\Dulberg Cicero France Barch Production Complete\Pleadings Part 1.pdf (Page 118)

> On Aug 26, 2022, at 3:49 PM, Paul Dulberg <Paul_Dulberg@comcast.net> wrote:

>

> I've been piecing together the June 2012 Mast Discovery Package sent to McGuire's and found some anomalies; Namely the lack of a cover letter from all 3 sets of documents, Popovich, Dulberg and Barch; also the moving COPY stamps and handwritten notes that seem to disappear on the various PROOF OF SERVICE versions that are FILE STAMPED yet they are on the one filed at the clerks office; and the misnamed NOTICE OF DEPOSITIONS OF DEFENDANTS to NOTICE OF DISCOVERY DEPOSITIONS.

>

> Makes me wonder if this was all actually mailed to Barch or if just the PROOF OF SERVICE was with a misnamed NOTICE OF DISCOVERY DEPOSITIONS.

>

> Reminder, this was the same date Mast also mailed Northwest Community Hospital and lied saying "I have not yet obtained the adverse parties insurance information".

>

> Details below:

>

> 2012-06-27 Mast PROOF OF SERVICE to Circuit Clerk & McGuires 1 of 5:

> PROOF OF SERVICE

>

> Popovich Documents:

> No Such Document Exists within the Popovich Document Disclosure

>

> Dulberg Documents:

> Dulberg 002116 - File stamped and Stamped COPY

> Dulberg 002117 - Stamped COPY

> Dulberg 004503 - File stamped and Stamped COPY

> Dulberg 004504 - Stamped COPY

> Dulberg 006211 - File stamped and Stamped COPY

> Dulberg 006543 - File stamped - Has handwritten note in upper right corner (pios?, Circuit Clerk written note?)

>

> Barch Documents:

> Dulberg Master File\Dulberg Cicero France Barch Production Complete\Pleadings Part 1.pdf (page 119 is stamped RECEIVED 6/27/2012)

>

> * Notes:

> — This is not in the Popovich documents.

> — NOTICE OF DEPOSITIONS OF DEFENDANTS as listed in the PROOF OF SERVICE is missing but NOTICE OF DISCOVERY DEPOSITIONS isn't.

> — See Dulberg documents above, How do handwritten notes disappear and COPY appear on file stamped versions? Also COPY stamp moves to different location on non file stamped versions.

> — Authored 6-19-2012

> — Mailed 6-25-2012

> — File Stamped 6-27-2012

> — Sent before Gagnon appeared in case
> — Cover Letter is missing in Dulberg and Popovich document disclosures as well as Barch Documents, PROOF OF SERVICE says mailed but without any cover letter how was this sent to Barch?
>
>
> 2012-06-27 Mast Discovery to McGuire 2 of 5:
> PLAINTIFF'S REQUEST FOR PRODUCTION TO DEFENDANTS, BILL McGUIRE AND CAROLINE McGUIRE
>
> Popovich Documents:
> No Such Document Exists within the Popovich Document Disclosure
>
> Dulberg Documents:
> Dulberg 001991 - Dulberg 001993
> Dulberg 004470 - Dulberg 004472
>
> Barch Documents:
> No Such Document Exists within the Subpoenaed Barch Documents
>
> * Notes:
> — This is not in the Popovich or Barch documents.
> — Authored 6-19-2012
> — Mailed 6-25-2012
> — Sent before Gagnon appeared in case
> — Cover Letter is missing in Dulberg and Popovich document disclosures as well as Barch Documents, PROOF OF SERVICE says mailed but without any cover letter how was this sent to Barch?
>
>
> 2012-06-27 Mast Discovery to McGuire 3 of 5:
> PLAINTIFF'S INTERROGATORIES TO DEFENDANTS, BILL McGUIRE AND CAROLINE McGUIRE
>
> Popovich Documents:
> No Such Document Exists within the Popovich Document Disclosure
>
> Dulberg Documents:
> Dulberg 001980 - Dulberg 001986
> Dulberg 004459 - Dulberg 004465
> Dulberg 006212 - Dulberg 006218
>
> Barch Documents:
> No Such Document Exists within the Subpoenaed Barch Documents
>
> * Notes:
> — This is not in the Popovich or Barch documents.
> — Authored 6-19-2012
> — Mailed 6-25-2012
> — Sent before Gagnon Appeared in case
> — Cover Letter is missing in Dulberg and Popovich document disclosures as well as Barch Documents, PROOF OF SERVICE says mailed but without any cover letter how was this sent to Barch?
>
>
> 2012-06-27 Mast Discovery to McGuire 4 of 5:
> PLAINTIFF'S RULE 237(b) NOTICE TO PRODUCE AT TRIAL AND/OR ARBITRATION TO DEFENDANTS, BILL McGUIRE AND CAROLINE McGUIRE
>
> Popovich Documents:

> No Such Document Exists within the Popovich Document Disclosure
>
> Dulberg Documents:
> (Dulberg 001994)
> (Dulberg 004473)
> (Dulberg 005784)
>
> Barch Documents:
> No Such Document Exists within the Subpoenaed Barch Documents
>
> * Notes:
> — This is not in the Popovich or Barch documents.
> — Authored 6-19-2012
> — Mailed 6-25-2012
> — Sent before Gagnon Appeared in case
> — Cover Letter is missing in Dulberg and Popovich document disclosures as well as Barch Documents, PROOF OF SERVICE says mailed but without any cover letter how was this sent to Barch?
> — 237b goes unanswered indefinitely?
> — * Revisit — add date that McGuires responded to only 2 parts of this 3 part written discovery here. Check July and August 2012.
>
>
> 2012-06-27 Mast Discovery to McGuires 5 of 5:
> NOTICE OF DISCOVERY DEPOSITIONS
>
> Popovich Documents:
> No Such Document Exists within the Popovich Document Disclosure
>
> Dulberg Documents:
> (Dulberg 001752)
> (Dulberg 004283)
> (Dulberg 005981)
>
> Barch Documents:
> Dulberg Master File\Dulberg Cicero France Barch Production Complete\Pleadings Part 1.pdf (Page 116)
>
> * Notes:
> — NOTICE OF DEPOSITIONS OF DEFENDANTS as listed in the PROOF OF SERVICE is missing but NOTICE OF DISCOVERY DEPOSITIONS isn't.
> — This is not in the Popovich documents.
> — Authored 6-19-2012
> — Mailed 6-25-2012
> — Sent before Gagnon Appeared in case
> — Cover Letter is missing in Dulberg and Popovich document disclosures as well as Barch Documents, PROOF OF SERVICE says mailed but without any cover letter how was this sent to Barch?
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