

Date : 9/9/2022 8:38:56 AM
From : "Alphonse Talarico"
To : "Paul Dulberg" , "Paul Dulberg"
Subject : Fw: Records Subpoenas Dulberg v. Mast et al 17 LA 377

From: Julia Williams <juliawilliams@clintonlaw.net>
Sent: Thursday, September 8, 2022 4:30 PM
To: Ed Clinton <ed@clintonlaw.net>
Cc: Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>
Subject: Re: Records Subpoenas Dulberg v. Mast et al 17 LA 377

Dear Mr. Talarico,

As I stated previously, we would prefer not to issue a formal response to the subpoena as it requests privileged attorney-client communication between our office and Mr. Dulberg, as well as work product in the form of notes.

Instead, I am attaching here all of my communications (emails) about the Mast Deposition with third parties as well as the deposition and exhibits. These documents would be what we would produce in our response.

Attached you will find all of the emails regarding Hans Mast deposition between our firm and third parties as well as the transcript and documents.

I did not produce emails between our firm and Mr. Dulberg, but as I recall those emails were included with the file that we produced previously via flash drive.

As I stated when we spoke previously, we are happy to produce what you need, but we do not want to breach any attorney-client privilege by responding to the subpoena formally.

If you would prefer for us to respond formally to the subpoena we will do so, but we will be objecting to any request for attorney-client communication and attorney work product. We could also agree to narrow the request to (a) exclude attorney-client privileged communication and work product between and among, Julia Williams, Edward Clinton, Jr., The Clinton Law Firm, Paul Dulberg and any successor counsel for Dulberg, and (b) exclude any work product.

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 Sep 8, 2022, at 2:33 PM, Ed Clinton <ed@clintonlaw.net> wrote:

Alphonse,

Can you send me the subpoena?
Ed

On Sep 8, 2022, at 2:31 PM, Alphonse Talarico
<contact@lawofficeofalphonsetalarico.com> wrote:

Dear Attorneys Julia C. Williams and Edward X. Clinton,
After careful consideration of all concepts raises and a careful review of work product, I find that neither Records Subpoena has been complied with and therefore demand such compliance.
As a courtesy to two fellow members of the bar I have reset the original document compliance date to be on or before September 22, 2022 and the records deposition to be :

- for Julia C. Williams on October 6, 2022 starting at 10:00 AM
- for Edward X. Clinton October 6, 2022 starting at 1:00 PM

all other instructions and the location where to send/appear shall remain the same as stated in the subpoenas.

Your anticipated cooperation is greatly appreciated,
Alphonse A. Talarico
(312) 808-1410