

Date : 9/26/2022 12:17:03 PM
From : "Paul Dulberg"
To : "Law Office Of Alphonse Talarico"
BCc : "Paul Dulberg" , "Tom Kost"
Subject : Re: Barb Dulberg as witness

I forgot to add that Barb and Randy Baudin attended the IME with Dr Craig Phillips, they both were in the room as I was examined, and can attest to the lies found in the IME report.

> On Sep 26, 2022, at 11:43 AM, Paul Dulberg <Paul_Dulberg@comcast.net> wrote:
>
> Dear Mr Talarico,
>
> I am worried because my mother is approaching 84 in the next 2 months and every day she is still with us is a blessing.
>
> Barb Dulberg is witness to:
>
> Every meeting prior to November 20, 2013 with Hans Mast.
>
> The meeting and the documents I Trusted Saul Ferris with.
>
> The meeting with Brad Balke
>
> The meetings with The Boudins including the dinner at the restaurant over the ADR
>
> The ADR Hearing, Reddington and the Boudins talk of a \$50,000 cap , the Lanford report showing McGuire's partial liability
>
> The SSDI hearings and meetings with Bradshaw
>
> And possibly more...
>
> These are just the main points that Barb witnessed.
>
> Lets discuss what needs to be done so we can do either an affidavit of her witness statements or a evidentiary deposition for Barb before her health deteriorates any further and we lose her as a witness.
>
> Thank You,
> Paul
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