

**Date : 10/5/2022 10:30:42 AM**  
**From : "Paul Dulberg"**  
**To : "Alphonse Talarico"**  
**BCc : "Paul Dulberg"**  
**Subject : Fwd: Barch Documents**

Begin forwarded message:

**From:** Paul Dulberg <[Paul\\_Dulberg@comcast.net](mailto:Paul_Dulberg@comcast.net)>  
**Subject: Re: Barch Documents**  
**Date:** March 3, 2020 at 3:53:48 PM CST  
**To:** Ed Clinton <[ed@clintonlaw.net](mailto:ed@clintonlaw.net)>

Hi Ed,

Yes you have my permission as long as it is for settlement purposes only and does not bind us later down the road.

Thanks,  
Paul

On Mar 3, 2020, at 3:50 PM, Ed Clinton <[ed@clintonlaw.net](mailto:ed@clintonlaw.net)> wrote:

Paul,  
I'd like to make a demand to at least gain information - are they going to offer anything or not?  
\$350,000 is obviously better.  
Do I have your approval to make that demand?  
Ed

On Feb 23, 2020, at 9:27 AM, Paul Dulberg  
<[Paul\\_Dulberg@comcast.net](mailto:Paul_Dulberg@comcast.net)> wrote:

Hi Ed,  
On this demand letter, I'd rather the larger number you suggested of 350,000 over 261,000 but trust you to decide which number we have to put in it.  
Thanks,  
Paul

On Feb 22, 2020, at 7:37 AM, Paul Dulberg  
<[Paul\\_Dulberg@comcast.net](mailto:Paul_Dulberg@comcast.net)> wrote:

Hi Ed,  
Assuming for a moment that if we have to  
litigate this in front of a judge or jury and  
eventually we do become limited by collateral  
estoppel what changed from the email below  
asking \$350,000 in the demand to \$261,000  
now?  
Thanks,  
Paul

On Feb 15, 2020, at 9:45 AM, Ed  
Clinton <[ed@clintonlaw.net](mailto:ed@clintonlaw.net)>  
wrote:

I was thinking more like \$350,000.

Edward X. Clinton, Jr.  
The Clinton Law Firm, LLC  
111 West Washington Street, Suite  
1437  
Chicago, IL 60602  
(312) 357-1515  
[www.clintonlaw.net](http://www.clintonlaw.net)

Sent from [Mail](#) for Windows 10



**From:** Paul Dulberg  
<[Paul\\_Dulberg@comcast.net](mailto:Paul_Dulberg@comcast.net)>  
**Sent:** Friday, February 14, 2020  
7:39:32 PM  
**To:** Ed Clinton <[ed@clintonlaw.net](mailto:ed@clintonlaw.net)>  
**Cc:** Julia Williams  
<[juliawilliams@clintonlaw.net](mailto:juliawilliams@clintonlaw.net)>;  
Mary Winch  
<[marywinch@clintonlaw.net](mailto:marywinch@clintonlaw.net)>  
**Subject:** Re: Barch Documents

Hi Ed,  
I haven't heard back so I'm assuming you  
just want a number.  
If you need a number to start negotiating  
from start at 6,600,000 - 300,000 that  
was already paid from the ADR award.  
Thats 6,300,000.  
Let's see where they come in at.

Thats the number from everything I've researched over the past 9 years that a jury today would award in the underlying case.

I hope that these are for settlement purposes only because I have no intention of limiting any possible recovery.

Thanks,

Paul

On Feb 14, 2020, at 6:32 PM, Paul Dulberg  
<[Paul\\_Dulberg@comcast.net](mailto:Paul_Dulberg@comcast.net)> wrote:

Hi Ed,

Sorry for all the emails in a row but I have too many questions

How does this demand then negotiation work?

Is it true that even if they agree to some arbitrary number don't we still need to prove the McGuires and Gagnons could pay for it or is that the case only if it goes to trial?

Paul

On Feb 14, 2020, at 6:11 PM, Paul

Dulberg  
<[Paul\\_Dulberg@comcast.net](mailto:Paul_Dulberg@comcast.net)>  
wrote:

Hi Ed,  
Should I hire an expert to come up with the number?  
Thanks,  
Paul

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[edd@clintononline.net](mailto:edd@clintononline.net)  
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Paul

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[linduberg@comcast.net](#)>

wrote:

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Paul

On

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< [Paul.Duberg@comcast.net](mailto:Paul.Duberg@comcast.net) >

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[berq@comcast.net](mailto:berq@comcast.net)

wrote:

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< [Paul-Duberg@comcast.net](mailto:Paul-Duberg@comcast.net) >

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