

**Date : 10/5/2022 10:40:04 AM**  
**From : "Paul Dulberg"**  
**To : "Alphonse Talarico"**  
**BCc : "Paul Dulberg"**  
**Subject : Fwd: Court Order**

Begin forwarded message:

**From:** Paul Dulberg <[Paul\\_Dulberg@comcast.net](mailto:Paul_Dulberg@comcast.net)>  
**Subject: Re: Court Order**  
**Date:** June 5, 2020 at 12:53:37 PM CDT  
**To:** The Clinton Law Firm <[juliawilliams@clintonlaw.net](mailto:juliawilliams@clintonlaw.net)>  
**Cc:** Ed Clinton <[ed@clintonlaw.net](mailto:ed@clintonlaw.net)>, Mary Winch <[marywinch@clintonlaw.net](mailto:marywinch@clintonlaw.net)>

Hi Julia,

Now that I understand why we are doing a remote deposition I'm still concerned about coaching.

Since dealing with Covid is new to all of us I don't know that there is a set of standard procedures to guide us.

I have a few ideas and would be open to suggestions

1. Perhaps we can place the stenographer in the room with Mast and Flynn to ensure our rights are not violated? Of coarse the stenographer would have to accept the responsibilities we would normally do ourselves.
2. Perhaps we could hire a neutral 3rd party to sit in the room?
3. Perhaps the court could appoint someone to sit in the room?

I'm shooting off the hip here and would like some input as to how best to ensure that Mast is not coached by either his attorney or anyone else and that all electronic devices are shut off and no hand gestures are used.

Also, I believe it would be best if Mast was not at his own office nor his attorney's office for the deposition.

Thank You and Stay Safe,  
Paul

On Jun 5, 2020, at 9:48 AM, Paul Dulberg  
<[Paul\\_Dulberg@comcast.net](mailto:Paul_Dulberg@comcast.net)> wrote:

I completely understand. I take care of my 82 yr old mom and won't be able to see her for 2 weeks because I went to court this morning. Thank you for clarifying this.

On Jun 5, 2020, at 9:08 AM, Julia Williams  
<[juliawilliams@clintonlaw.net](mailto:juliawilliams@clintonlaw.net)> wrote:

Dear Paul,  
Thank you for the order.  
It was our decision to conduct a remote deposition, not Mr. Mast. We are not conducting any in-person depositions due to the risk our staff and attorneys. We have people in our office/their family in high risk groups. I am simply unwilling to expose them any more than necessary.  
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](mailto:juliawilliams@clintonlaw.net)

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On Jun 5, 2020, at 9:04 AM, Paul Dulberg  
<[Paul\\_Dulberg@comcast.net](mailto:Paul_Dulberg@comcast.net)> wrote:

Mr. Popovich was in Court this morning and had no problem being in a room full of people. Makes me curious if Mast shows up for his court dates but is using Covid to avoid personally attending depositions.

Here is today's court order

<IMG\_0171.jpg>

