

Date : 11/4/2022 6:16:28 PM
From : "Alphonse Talarico"
To : "Paul Dulberg" , "Paul Dulberg"
Subject : Fw: Mast deposition

From: Julia Williams <juliawilliams@clintonlaw.net>
Sent: Friday, November 4, 2022 4:01 PM
To: Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>; George Flynn <gflynn@karballaw.com>
Cc: Ed Clinton <ed@clintonlaw.net>; Mary Winch <marywinch@clintonlaw.net>
Subject: Fwd: Mast deposition

Dear Mr. Talarico and Mr. Flynn,
Below you will find the full email chain that was produced as a pdf with Bates Stamp Dulberg Clinton Subpoena Privileged Communication 269-274. As there is a chain with exhibits, I will be sending the specific emails with the exhibits as well as the full chain.
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.

Begin forwarded message:

From: Paul Dulberg <Paul_Dulberg@comcast.net>
Subject: Re: Mast deposition
Date: June 22, 2020 at 3:35:20 PM CDT
To: The Clinton Law Firm <juliawilliams@clintonlaw.net>
Cc: Ed Clinton <ed@clintonlaw.net>, Mary Winch <marywinch@clintonlaw.net>

Ok, sorry, I got exhibit 7

On Jun 22, 2020, at 3:26 PM, Paul Dulberg
<Paul_Dulberg@comcast.net> wrote:

Hi Julia,
It appears that exhibit 6 and 7 are identical that I downloaded from the links provided.

I think it is exhibit 7 that is missing
Paul

On Jun 22, 2020, at 1:45 PM, Julia Williams
<juliawilliams@clintonlaw.net> wrote:

Dear Ed and Paul,

I have attached an outline of the questioning and the exhibits we will use for the deposition—this is an ongoing work product and will serve as our source of discussion tomorrow.

Please note that all of the questions listed and the exhibits listed may NOT be used in the deposition. It is simply an outline of topics/etc that I intend to cover. Depending on Mast's answers, things may change. It is my intention to focus on the work around the McGuire claim. As Paul was able to go to arbitration and recover on the Gagnon claim, there is not a question of Gagnon's liability. The damages do not stem from the claim regarding Gagnon as that claim was won at arbitration. The crux of the claim is that the McGuires would have been found liable for failing to supervise Gagnon and thus would have been required to pay, jointly and severally, for the damages.

Here is the information to call in tomorrow:

Dulberg Case Mast Deposition Preparation Call

Tue, Jun 23, 2020 2:00 PM - 2:30 PM (CDT)

You dial in using your phone.

United States: +1 (872) 240-3311

Access Code: 468-503-221

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

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Dulberg Mast deposition questions 2020 June 22.docx
29 KB

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Dulberg Mast Dep Exh 1 Retainer Contract.pdf
64 KB

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Dulberg Mast Dep Exh 2 Complaint.pdf
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89 KB

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18.pdf
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273 KB

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Dulberg Mast Dep Exh 23 Emails re Gagnon Value 2015 Mar
12.pdf
206 KB

On Jun 18, 2020, at 9:24 AM, Paul Dulberg
<Paul.Dulberg@comcast.net> wrote:

Hi Julia,

Please find the attached evidence_list.txt and
questions_for_mast.txt that we wish to discuss with you
next week before Masts deposition.

Thank you and stay safe,
Paul

<evidence_list.txt><questions_for_mast.txt>