

From: Julia Williams juliawilliams@clintonlaw.net 
Subject: Dulberg v Mast et al
Date: June 4, 2020 at 12:14 PM
To: Paul Dulberg paul_dulberg@comcast.net
Cc: Mary Winch marywinch@clintonlaw.net, Ed Clinton ed@clintonlaw.net



Dear Paul,

Attached is the notice of deposition for Hans Mast. June 25, 2020 at 10 am. It will be a remote deposition. You will be able to participate remotely.

We will provide more information on the logistics of that.


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.



Dulberg Mast
Notice...e 2.pdf

From: Paul Dulberg Paul_Dulberg@comcast.net 
Subject: Re: Dulberg v Mast et al
Date: June 4, 2020 at 12:42 PM
To: The Clinton Law Firm juliawilliams@clintonlaw.net
Cc: Mary Winch marywinch@clintonlaw.net, Ed Clinton ed@clintonlaw.net



Hi Julia,

I am requesting a meeting with you, Ed and my brother Tom within one week prior to Mast's deposition. Let's find a time that works for both you and Ed and schedule this in.

Also, I have 5 questions about the remote deposition:

1. Who will conduct the deposition, both you and Ed or just one of you, if only one which one?
2. If this is a video deposition may we record the actual video of the deposition and use it later at trial?
3. If this is to be an audio only deposition may we record the actual audio and use it later at trial?
4. Will Mast be in the same location as his attorney or will each of them attend from different locations?
5. If Mast is not in the same location as his attorney what guarantees do we have that no one else will be present? My concern here is coaching by Thomas Popovich or any other person with Mast that will not be in view of the camera or seen at all if this is audio only. Including coaching over text or other electronic means.

Thank you and stay safe,
Paul

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From: Julia Williams juliawilliams@clintonlaw.net 
Subject: Re: Dulberg v Mast et al
Date: June 4, 2020 at 1:56 PM
To: Paul Dulberg Paul_Dulberg@comcast.net
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Dear Paul,

Responses below.

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Cc: Mary Winch marywinch@clintonlaw.net, Ed Clinton ed@clintonlaw.net



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This doesn't seem fair.

Mast is not to be trusted at all.

Do I have a choice in this?

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From: Paul Dulberg Paul_Dulberg@comcast.net 
Subject: Re: Dulberg v Mast et al
Date: June 4, 2020 at 7:50 PM
To: The Clinton Law Firm juliawilliams@clintonlaw.net
Cc: Mary Winch marywinch@clintonlaw.net, Ed Clinton ed@clintonlaw.net



Hi Julia,

I am sorry for the earlier emotional rant.

The only issues I have is with the answer to question number 5.

I do not feel there is enough of a guarantee that Mast will not be coached in his answers.

Also, we lose out on the non verbal expressions and postures we would see in an in person interview. As you know those non verbal expressions don't end up in the final transcript but often do change the next question asked.

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Responses below.

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Also, I have 5 questions about the remote deposition:

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From: Julia Williams juliawilliams@clintonlaw.net 
Subject: Re: Dulberg v Mast et al
Date: June 5, 2020 at 9:01 AM
To: Paul Dulberg Paul_Dulberg@comcast.net
Cc: Mary Winch marywinch@clintonlaw.net, Ed Clinton ed@clintonlaw.net



Dear Paul,

We will be able to view Mr. Mast via the video connection during the deposition. We will ask that the camera be placed at such a distance that we can see his body as seated and will know if he is receiving coaching via texting or other electronic means. Further, we will ask that no electronic devices be in his immediate reach and that any he brought will be turned off. As I previously stated, the video will not be recorded for future use, there will be a transcript, which is the same as a traditional deposition.

Given the pandemic, our office is not conducting any in-person depositions due to the risk to our attorneys/staff and their families. We do not know when that will resume given that some of our attorneys/staff and their families are in high risk populations.

We believe it is in your best interest to move forward with the remote deposition as scheduled.

Best Regards,

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From: Paul Dulberg Paul_Dulberg@comcast.net 
Subject: Re: Dulberg v Mast et al
Date: June 11, 2020 at 10:13 AM
To: The Clinton Law Firm juliawilliams@clintonlaw.net
Cc: Mary Winch marywinch@clintonlaw.net, Ed Clinton ed@clintonlaw.net



Hi Julia,

A meeting on the 22nd or 23rd at 3:00 pm is fine just let us know when is best for you.

I take it this meeting will be on the phone due to Covid?

I will send you an email the day before the meeting with the materials we would like discussed.

Also, my brother Tom has volunteered to be our eyes in the same room as Mast at the deposition if this is allowed.

Thanks,
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