


From: Julia Williams juliawilliams@clintonlaw.net 
Subject: Dulberg v Popovich et al
Date: December 17, 2019 at 6:30 PM
To: George Flynn gflynn@KARBALLAW.COM
Cc: ed@clintonlaw.net, marywinch@clintonlaw.net



Dear George,

Per our call today:

Dulberg Discovery Responses:

1. You requested the attachments to the emails that were produced with Bates Stamp Dulberg 2620-2638. We will review those bates documents and determine the location of the attachments. If they were previously produced, we will provide the bates stamp for those documents. If they have not produced them, we will either produce or let you know we do not have possession or control.
2. Brad Balky. His name appears in some of the documents. You requested that we identify when he represented Mr. Dulberg and in what capacity. If he did represent Mr. Dulberg for any period, we will produce any records related to that that are in Mr. Dulberg's possession and control.
3. Verification. We previously produced a verification page for the discovery requests. It is our intention that the verification be attached to all discovery answers. You requested an updated verification for the request to produce that complies strictly with 214. We will provide such compliant verification.

Subpoenas:

1. Joe Olson. We sent a subpoena to Mr. Dulberg's bankruptcy trustee. He informally responded as we discussed on the phone. I sent you 9 emails that he sent to me. I may find a better way to track those, but at least you now have possession of them.
2. Chantel Bielskis of Cicero France & Alexander reached out asking for more time to respond to our subpoena to their office. I have granted her more time and working on getting information from her.

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1. Here is a list of the blacked out pages in your clients document production. Please review and advise. I would be happy to review the physical file if that would resolve this issue.

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Moving Forward:

1. We discussed the following dates for deposition:

- A. Paul Dulberg. Feb. 12
- B. Hans Mast FEB. 19/20

Locations and time TBD.

Feel free to reach out with questions/responses.

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.

From: George Flynn gflynn@karballaw.com 
Subject: RE: Dulberg v Popovich et al
Date: December 18, 2019 at 3:32 PM
To: Julia Williams juliawilliams@clintonlaw.net



Thanks much Julia. Let this also acknowledge the 9 separate emails you sent, which included additional document productions.

I will continue to investigate the blacked out pages.

Best regards,


George Flynn


Karbal | Cohen | Economou | Silk | Dunne | LLC

150 S. Wacker Drive

Suite 1700

Chicago, IL 60606

 P: (312) 431-3622

 F: (312) 431-3670

 E: gflynn@karballaw.com

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From: Julia Williams <juliawilliams@clintonlaw.net>
Sent: Tuesday, December 17, 2019 6:30 PM
To: George Flynn <gflynn@karballaw.com>
Cc: Ed Clinton <ed@clintonlaw.net>; Mary Winch <marywinch@clintonlaw.net>
Subject: Dulberg v Popovich et al

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juliawilliams@clintonlaw.net

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From: Mary Winch marywinch@clintonlaw.net 
Subject: Re: Dulberg v Popovich et al
Date: January 2, 2020 at 11:23 AM
To: Julia Williams juliawilliams@clintonlaw.net, George Flynn gflynn@KARBALLAW.COM
Cc: Ed Clinton ed@clintonlaw.net



Julia,

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Mary

From: "juliawilliams@clintonlaw.net" <juliawilliams@clintonlaw.net>
Date: Tuesday, December 17, 2019 at 6:30 PM
To: George Flynn <gflynn@KARBALLAW.COM>
Cc: "ed@clintonlaw.net" <ed@clintonlaw.net>, "marywinch@clintonlaw.net" <marywinch@clintonlaw.net>
Subject: Dulberg v Popovich et al

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Of Counsel

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P:312.357.1515

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juliawilliams@clintonlaw.net

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From: Julia Williams juliawilliams@clintonlaw.net 
Subject: Re: Dulberg v Popovich et al
Date: January 9, 2020 at 12:25 PM
To: Mary Winch marywinch@clintonlaw.net
Cc: George Flynn gflynn@KARBALLAW.COM, Ed Clinton ed@clintonlaw.net



Hi Mary,

I am having Alexis look through some of these documents.

Can you reach out to Paul and see if he is available to sit for his deposition on Feb. 12?

Let him know that in the mean time, we are still working with opposing counsel to make sure we have all of the discovery done prior to that date.

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On Jan 2, 2020, at 11:23 AM, Mary Winch <marywinch@clintonlaw.net> wrote:

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Mary

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Date: Tuesday, December 17, 2019 at 6:30 PM
To: George Flynn <gflynn@KARBALLAW.COM>
Cc: "ed@clintonlaw.net" <ed@clintonlaw.net>, "marywinch@clintonlaw.net" <marywinch@clintonlaw.net>
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From: George Flynn gflynn@karballaw.com  
Subject: Re: Dulberg v Popovich et al
Date: January 9, 2020 at 12:28 PM
To: Julia Williams juliawilliams@clintonlaw.net

GF

Julia- just a heads up that I'm on this email chain. I'm not sure I was meant to be.

George Flynn

Karbal | Cohen | Economou | Silk | Dunne | LLC

150 S. Wacker Drive

Suite 1700

Chicago, IL 60606

 P: (312) 431-3622

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 E: gflynn@karballaw.com

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Nope. That was a complete error. Please disregard this. Thanks.

Julia Williams
Attorney
111 W. Washington, Ste. 1437
Chicago, IL 60602
312-508-3376
Jwilliams@williamslawchicago.com

Sent from my iPhone.

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To: Julia Williams juliawilliams@clintonlaw.net



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George Flynn

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Jwilliams@williamslawchicago.com

Sent from my iPhone.

This message may be privileged or confidential. If you are not the intended recipient, please notify the sender and delete this message immediately.

On Jan 9, 2020, at 12:28 PM, George Flynn <gflynn@karballaw.com> wrote:

Julia- just a heads up that I'm on this email chain, I'm not sure I was meant to be.

George Flynn

Karbal | Cohen | Economou | Silk | Dunne | LLC

150 S. Wacker Drive

Suite 1700

Chicago, IL 60606

<phone_3aef1e25-ed01-4e86-9c05-55877d93199b.jpg>

P: (312) 431-3622

<fax_b47779bc-2f12-4a09-9ce3-87f4947c34ef.png>

F: (312) 431-3670

<envelope_5540fafc-2f13-4c5f-af64-a2c20113037b.png>

E: gflynn@karballaw.com

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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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Mary

From: "juliawilliams@clintonlaw.net" <juliawilliams@clintonlaw.net>
Date: Tuesday, December 17, 2019 at 6:30 PM
To: George Flynn <gflynn@KARBALLAW.COM>
Cc: "ed@clintonlaw.net" <ed@clintonlaw.net>, "marywinch@clintonlaw.net" <marywinch@clintonlaw.net>
Subject: Dulberg v Popovich et al

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Per our call today:

Dulberg Discovery Responses:

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Moving Forward:

1. We discussed the following dates for deposition:

- A. Paul Dulberg. Feb. 12
- B. Hans Mast Feb. 19/20

Locations and time TBD.

Feel free to reach out with questions/responses.


Best Regards,

Julia Williams
Of Counsel



OT 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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From: Julia Williams juliawilliams@clintonlaw.net 
Subject: Re: Dulberg v Popovich et al
Date: January 9, 2020 at 1:17 PM
To: George Flynn gflynn@karballaw.com



Thank you!

Julia Williams
Of Counsel
The Clinton Law Firm
111 W. Washington, Ste. 1437
Chicago, IL 60602
P: 312.357.1515
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<[phone_3aef1e25-ed01-4e86-9c05-55877d93199b.jpg](tel:3124313622)> P: (312) 431-3622

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Nope. That was a complete error. Please disregard this. Thanks.

Julia Williams
Attorney
111 W. Washington, Ste. 1437
Chicago, IL 60602
312-508-3376
jwilliams@williamslawchicago.com

Sent from my iPhone.

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- A. Paul Dulberg. Feb. 12
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Locations and time TBD.

Feel free to reach out with questions/responses.

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Date: January 29, 2020 at 2:16 PM
To: George Flynn gflynn@KARBALLAW.COM
Cc: ed@clintonlaw.net, marywinch@clintonlaw.net



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Can we confirm that on Monday, February 3, 2020 after court that we will go together and review Hans file?

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Date: January 30, 2020 at 3:34 PM
To: George Flynn gflynn@KARBALLAW.COM
Cc: Ed Clinton ed@clintonlaw.net, Mary Winch marywinch@clintonlaw.net



Dear George,

Please find attached the updated 214 affidavit.

We will continue to supplement records as required under the rule.

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VERIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure and in compliance with Supreme Court Rule 214, the undersigned certifies that the statements set forth in this instrument are true and correct, and that the production is complete, except as otherwise noted therein, and except as to matters therein stated to be on information and belief as to such matters the undersigned certifies as aforesaid that s/he verily believes the same to be true.


Paul Dulberg

From: George Flynn gflynn@karballaw.com 
Subject: RE: Dulberg v Popovich et al
Date: January 30, 2020 at 3:50 PM
To: Julia Williams juliawilliams@clintonlaw.net
Cc: Ed Clinton ed@clintonlaw.net, Mary Winch marywinch@clintonlaw.net

GF

Julia:

I appreciate you forwarding the affidavit. The issue with it is that it is general, is not dated, and does not identify the instrument it is referencing (nor is it attached to the referenced instrument).

I would prefer that it be attached to whatever document is referencing, should it need to be marked as an exhibit at a deposition, for example.

My apologies, I am not trying to create additional work here, but it could become a bit unwieldy if I had to attach a discovery response, a general undated 214 affidavit, and an email from you explaining the document that it is intended to support, all as an exhibit.

Please also let me know where we stand on the email attachments that were not previously produced. The "PDF" icon which shows in the subject lines of the emails, suggests that they would have still been in Mr. Dulberg's possession when he produced the emails.

Could you also please call me regarding our tentative February 3 inspection? I have a conflict that I may not be able to clear.

Thanks


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Date: January 30, 2020 at 3:59 PM
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Cc: Ed Clinton ed@clintonlaw.net, Mary Winch marywinch@clintonlaw.net



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Dulberg RTP
Respo...30.pdf

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Thanks George.

I will give you buzz later today (we are getting new phones right now).

We can reschedule the review of Mast's file. I would like to get that done before we move forward with depositions.

As to RFP 4 and 5, yes, if we have further responsive documents we will produce them in a supplement. I believe we have produced everything in the client's possession and control as he advised that he turned everything over to us. In my last email, I was specifically referring to the interrogatories only .

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On Dec 17, 2019, at 6:30 PM, Julia Williams
<juliawilliams@clintonlaw.net> wrote:

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Per our call today:

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stamp for those documents. If they have not produced them, we will either produce or let you know we do not have possession or control.

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To be produced asap.

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We sent you the files.

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1. Here is a list of the blacked out pages in your clients document production. Please review and advise. I would be happy to review the physical file if that would resolve this issue.

Dulberg Matter

Bates Stamped Blacked Out in Popovich Firm Document Production

Pop 60,63, 66,72, 78,81, 85,89, 95, 100, 106, 111,124, 127, 131, 136, 139, 146, 149, 152, 155, 160, 162, 165, 168,171, 174, 180, 183,186, 191, 194, 199, 204, 207, 209, 211, 215, 219, 222,225, 230, 239, 248 252, 257, 261, 265, 267, 270,273, 277, 281, 285, 298, 300, 303, 307, 311, 319, 323, 331, 333, 344, 347, 360, 363, 382, 386, 390, 394, 397, 497, 557, 697, 703 708, 713, 721, 723, 728, 742, 748, 752, 755, 762, 770, 866, 889, 895, 899 905 908 915 918 925 928 937 935 939 944 954

960, 963, 966, 977

Moving Forward:

1. We discussed the following dates for deposition:

- A. Paul Dulberg. Feb. 12
- B. Hans Mast Feb. 19/20


Locations and time TBD.

Feel free to reach out with questions/responses.

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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From: George Flynn gflynn@karballaw.com 
Subject: RE: Dulberg v Popovich et al
Date: January 31, 2020 at 11:23 AM
To: Julia Williams juliawilliams@clintonlaw.net
Cc: Ed Clinton ed@clintonlaw.net, Mary Winch marywinch@clintonlaw.net



Fair enough. Thanks Julia.

I will be in the office until I leave for court around 2:30 p.m.


George Flynn


Karbal | Cohen | Economou | Silk | Dunne | LLC

150 S. Wacker Drive

Suite 1700

Chicago, IL 60606

 P: (312) 431-3622

 F: (312) 431-3670

 E: gflynn@karballaw.com

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From: Julia Williams <juliawilliams@clintonlaw.net>
Sent: Friday, January 31, 2020 11:21 AM
To: George Flynn <gflynn@karballaw.com>
Cc: Ed Clinton <ed@clintonlaw.net>; Mary Winch <marywinch@clintonlaw.net>
Subject: Re: Dulberg v Popovich et al

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Popovich's RFP numbers 4 and 5 ask for documents and engagement agreements regarding all counsel for Dulberg in the underlying matter. I agree that an amended interrogatory answer would not be required, but if this leads to the production of more responsive documents, please advise.

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Sent: Thursday, January 30, 2020 4:00 PM

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Cc: Ed Clinton <ed@clintonlaw.net>; Mary Winch

<marywinch@clintonlaw.net>

Subject: Re: Dulberg v Popovich et al

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I can inspect on Feb 3, if that still works for you.

I will have the PDFs attached to the emails by Friday.

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Dulberg Matter

Bates Stamped Blacked Out in Popovich
Firm Document Production

Pop 60,63, 66,72, 78,81, 85,89, 95, 100, 106,
111,124, 127, 131, 136, 139, 146, 149, 152,
155, 160, 162, 165, 168,171, 174, 180,
183,186, 191, 194, 199, 204, 207, 209, 211,
215, 219, 222,225, 230, 239, 248 252, 257,
261, 265, 267, 270,273, 277, 281, 285, 298,
300, 303, 307, 311, 319, 323, 331, 333, 344,
347, 360, 363, 382, 386, 390, 394, 397, 497,
557, 697, 703 708, 713, 721, 723, 728, 742,
748, 752, 755, 762, 770, 866, 889, 895, 899,
905, 908 , 915,918,925 928,932, 935, 939,
944,954, 960, 963, 966, 977

Moving Forward:

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deposition:

A. Paul Dulberg. Feb. 12
B. Hans Mast Feb. 19/20

Locations and time TBD.


Feel free to reach out with
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Best Regards,

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...received receipt, please delete this
email and notify the sender immediately.

From: Julia Williams juliawilliams@clintonlaw.net 
Subject: Re: Dulberg v Popovich et al
Date: January 31, 2020 at 12:45 PM
To: George Flynn gflynn@karballaw.com
Cc: Ed Clinton ed@clintonlaw.net, Mary Winch marywinch@clintonlaw.net



Dear George,

I am writing regarding the outstanding discovery issues. I am producing further documents bates stamped 2639-2645.

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Bates Dulberg 2632.

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First attachment is Dr. Phillips CV previously produced as Dulberg 343-366. Second attachment is the report previously produced as Dulber 1617-1632.

2. Brad Balke.

Brad Balke's appearance is attached as 2645.

This should resolve all of the current discovery issues that you presented to us. We will continue to supplement our discovery responses if more documents are discovered.

We need to review Mast's file in person.

Best Regards,

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344, 347, 360, 363, 382, 386, 390, 394,
397, 497, 557, 697, 703 708, 713, 721, 723,
728, 742, 748, 752, 755, 762, 770, 866,
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A. Paul Dulberg. Feb. 12
B. Hans Mast Feb. 19/20


Locations and time TBD.

Feel free to reach out with questions/responses.

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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From: Julia Williams juliawilliams@clintonlaw.net 
Subject: Re: Dulberg v Popovich et al
Date: January 31, 2020 at 1:03 PM
To: George Flynn gflynn@karballaw.com
Cc: Ed Clinton ed@clintonlaw.net, Mary Winch marywinch@clintonlaw.net



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Subject: Re: Dulberg v Popovich et al

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I can inspect on Feb 3, if that still works for you.

I will have the PDFs attached to the emails by Friday.

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<marywinch@clintonlaw.net>

Subject: Re: Dulberg v Popovich et al

Dear George,

Please find attached the updated 214 affidavit.

We will continue to supplement records as required under the rule.

Best Regards,

Julia Williams

Of Counsel

The Clinton Law Firm

111 W. Washington, Ste. 1437

Chicago, IL 60602

708.357.1515

P:312.357.1515
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On Jan 29, 2020, at 2:16 PM, Julia Williams
<juliawilliams@clintonlaw.net> wrote:

Dear George,

Please see below follow up.

Can we confirm that on Monday, February 3, 2020 after court that we will go together and review Hans file?

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Dulberg Bates
2639 t...31.pdf

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Thanks Julia


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a2c20113037b.png> E: gflynn@karballaw.com

CONFIDENTIALITY NOTE:

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From: Julia Williams

<juliawilliams@clintonlaw.net>

Sent: Thursday, January 30, 2020 3:34 PM

To: George Flynn

<gflynn@karballaw.com>

Cc: Ed Clinton <ed@clintonlaw.net>;

Mary Winch

<marywinch@clintonlaw.net>

Subject: Re: Dulberg v Popovich et al

Dear George,

Please find attached the updated 214 affidavit.

We will continue to supplement records as required under the rule.

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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On Jan 29, 2020, at 2:16 PM, Julia Williams <juliawilliams@clintonlaw.net> wrote:

Dear George,

Please see below follow up.

Can we confirm that on Monday, February 3, 2020 after court that we will go together and review Hans file?

Thanks,

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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On Dec 17, 2019, at 6:30 PM, Julia Williams <juliawilliams@clintonlaw.net> wrote:

Dear George,

Per our call
today:

Dulberg
Discovery
Responses:

1. You requested the attachments to the emails that were produced with Bates Stamp Dulberg 2620-2638. We will review those bates documents and determine the location of the attachments. If they were previously produced, we will provide the bates stamp for those documents. If they have not produced them, we will either produce or let you know we do not have possession or control.

Bates Dulberg 002625.
This document is an email from Baudin's office to Dulberg with an attachment that is described in the email as from Dr. Kujawa. I could not locate the document in the discovery that has been produced. I am double checking with

my client to see if he has it.
We may need to subpoena
The Baudin Law Group for
all of their documents.

Bates Dulberg 2629. This is
an email from Baudin to
Dulberg with the ADR award.
The award is embedded in
the email.

Bates Dulberg 2631. This is
an email from Baudin to
Dulberg with a release for
signature attached. I
reviewed the documents and
the document was produced
as Bates Stamp Dulberg
1221-1223.

Bates Dulberg 2632.
This document is an email
from Baudin's office to
Dulberg with two
attachments. They appear to
be the expert report from the
IME (Craig Phillips?). I am
not sure if Craig Phillips was
the IME, but that may have
been the person.
I could not locate the
document in the discovery
that has been produced.
I am double checking with
my client to see if he has it.
We may need to subpoena
The Baudin Law Group for
all of their documents.

2. Brad Balky.
His name
appears in some
of the
documents. You
requested that
we identify when
he represented
Mr. Dulberg and
in what capacity.

If he did represent Mr. Dulberg for any period, we will produce any records related to that that are in Mr. Dulberg's possession and control.

I am following up on this. Brad Blake is an attorney and there are some emails from him in the discovery. I do not see that he represented Dulberg but I will verify with my client.

3. Verification.
We previously produced a verification page for the discovery requests. It is our intention that the verification be attached to all discovery answers. You requested an updated verification for the request to produce that complies strictly with 214. We will provide such compliant verification.

To be produced asap.

Subpoenas:

1. Joe Olson.

We sent a subpoena to Mr. Dulberg's bankruptcy trustee. He informally responded as we discussed on the phone. I sent you 9 emails that he sent to me. I may find a better way to track those, but at least you now have possession of them.

We sent you the files.

2. Chantel Bielskis of Cicero France & Alexander reached out asking for more time to respond to our subpoena to their office. I have granted her more time and working on getting information from her.

We sent you the files, I believe.

Popovich
Discovery:

1. Here is a list of the blacked out names in

out pages in
your clients
document
production.

Please review
and advise. I
would be happy
to review the
physical file if
that would
resolve this
issue.

Dulberg Matter

Bates Stamped
Blacked Out in
Popovich Firm
Document
Production

Pop 60,63, 66,72,
78,81, 85,89, 95,
100, 106, 111,124,
127, 131, 136,
139, 146, 149,
152, 155, 160,
162, 165, 168,171,
174, 180, 183,186,
191, 194, 199,
204, 207, 209,
211, 215, 219,
222,225, 230, 239,
248 252, 257, 261,
265, 267, 270,273,
277, 281, 285,
298, 300, 303,
307, 311, 319,
323, 331, 333,
344, 347, 360,
363, 382, 386,
390, 394, 397,
497, 557, 697, 703
708, 713, 721,
723, 728, 742,
748, 752, 755,
762, 770, 866,
889, 895, 899,
905, 908 ,
915,918,925
928, 932, 935, 938

928,932, 935, 939,
944,954, 960, 963,
966, 977

Moving Forward:

1. We discussed
the following
dates for
deposition:

A. Paul Dulberg.
Feb. 12
B. Hans Mast
FEb. 19/20

Locations and
time TBD.

Feel free to
reach out with
questions/respo
nses.

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@cli
ntonlaw.net](mailto:juliawilliams@clintonlaw.net)

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the email
and notify the
sender
immediately.

