

From: Paul Dulberg pdulberg@comcast.net
Subject: Re: 1st Draft of answers to interrogatories
Date: April 17, 2019 at 9:48 AM
To: The Clinton Law Firm juliawilliams@clintonlaw.net
Cc: Ed Clinton ed@clintonlaw.net, Mary Winch marywinch@clintonlaw.net

Sorry just one more thing,
When do you want me to start sending the documents?
They will take several email transfers
Thank you

On Apr 17, 2019, at 9:43 AM, Julia Williams <juliawilliams@clintonlaw.net> wrote:

Dear Paul,

You are on track with your answers. We will put this in its appropriate format and get it back to you by tomorrow close of business. The answers are due on Friday. If we need a bit more time, I will reach out to opposing counsel. I'm sure he will agree to a short extension.

Best Regards,

Julia Williams
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On Apr 17, 2019, at 9:15 AM, Paul Dulberg <pdulberg@comcast.net> wrote:

Hi Julia,
When are the responses due and am I on the right track or do my answers need more?
Thanks,
Paul

On Apr 15, 2019, at 11:01 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

Hi Julia,

Please find the attached 4 files;

Draft of Answers - 2316425v1 - Interrogatories to Plaintiff.txt
Notes on Draft of Answers - 2316425v1 - Interrogatories to Plaintiff.txt

Draft of Answers - 2316433v1 - Mast Interrogatories to Plaintiff.txt
Notes on Draft of Answers - 2316433v1 - Mast Interrogatories to Plaintiff.txt

These are drafts and notes for the response we need to have in soon.

Please check the responses and notes on the responses as I know time is too short for me to keep cleaning up the answers and gathering information to support those answers before I let you see them and weigh in on what I am doing right/wrong or could be doing or saying to get the answer as simple yet correct as possible.

I may have over or under answered from what is necessary, it's the first time I've tried to answer Interrogatories and I am trying to get every detail verifiably correct and know I'm running out of time.
The ones done in the underlying case were done with some input by me but were mainly generated by Mast, most likely Mast's memory or notes from our discussions.

The supporting documents for both the bankruptcy and Juskie Printing mentioned in the answers I'm hoping to hear back on soon so currently I do not have them.
Also, Mark from Juskie Printing cannot provide the 1099-MISC forms he submitted to the IRS but is willing to swear under oath or sign an affidavit as to what I was paid by him.

Also, you said you would look into the Medical file created by Mast and Margret Bradshaw. Any luck with that?

Thanks and I'm looking forward to your feed back on the drafts,
Paul

<Draft of Answers - 2316425v1 - Interrogatories to Plaintiff.txt><Notes on Draft of Answers - 2316425v1 - Interrogatories to Plaintiff.txt>

<Draft of Answers - 2316433v1 - Mast Interrogatories to Plaintiff.txt><Notes on Draft of Answers - 2316433v1 - Mast Interrogatories to Plaintiff.txt>