

From: Paul Dulberg pdulberg@comcast.net
Subject: Re: Dulberg v Popovich Updated Discovery
Date: May 29, 2019 at 11:58 AM
To: The Clinton Law Firm juliawilliams@clintonlaw.net
Cc: Ed Clinton ed@clintonlaw.net, Mary Winch marywinch@clintonlaw.net

PD

To me, I have nothing said between my attorneys and myself that I feel the need to shield but I honestly don't know enough about the privilege stuff to make an informed decision so I will have to refer to you counsel on that matter.

I am still sorting out emails to get the ones I need. Wish I had used a better program to turn them into PDFs so they wouldn't be such a mess.

Also, If we need to retain Dr. Lanford again, ok just let me know how much and who to make the check out to.

Thanks,
Paul

On May 29, 2019, at 11:29 AM, Julia Williams <juliawilliams@clintonlaw.net> wrote:

Understood. We will prepare the document disclosure, but hold off on the interrogatory answers until we hear from you.

Also, at this time, I have asserted attorney client privilege for any attorneys who represented you AFTER Hans Mast and outside of the Gagnon/McGuire matter.

It may be wise, and we frequently do this, to waive the attorney client privilege as to any attorney that represented you after Attorney Mast and in your bankruptcy and social security disability matters. You hold the privilege and you must specifically authorize the waiver of the privilege.

I would like to consider it a bit more before waiving, but wanted you to consider it as well.

Best Regards,

Julia Williams
Of Counsel
The Clinton Law Firm
111 W. Washington, Ste. 1437
Chicago, IL 60602
P: 312.357.1515
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juliawilliams@clintonlaw.net

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On May 29, 2019, at 8:37 AM, Paul Dulberg <pdulberg@comcast.net> wrote:

Morning Julia,

Last night I wrote you saying I would have the changes this morning but that is looking less possible than I had hoped.

Due to my impairment, usually my brother Tom helps me type the responses, scour through the emails, documents and look things up but he has not been available due to the Holiday and him being with his kids this week and last. So, I am finger pecking as fast as I can.

I am having issue with a few of the answers and have noted several changes but the line added to my original draft answer on number 24 of the answers to Popovich Interrogatories is the one that I am scouring through emails and documents about because it bothers me.

First, It was a release that was signed January 29th, Not a settlement authority or settlement demand which the question asks about.

Second, Mast never encouraged me on January 29th, Mast reiterated his same false choice argument of sign it or get nothing he made back in December. Emails on that day show me taking issue with the wording of the agreement but there is more to it than that. There were phone calls between Mast and myself after the final call is when I sent Mast the final email of the day stating that it was signed and mailed and that I had to trust his judgement.

Third, by adding that line to the answer it gives the appearance that somehow I did have until January 29th to decide when that is simply not true. Barch letter to Mast Dated December 26th show when Mast notified the McGuires council the deal was made. Masts response to emails about a letter sent to Mike Thomas being released from his deposition on January 8th show Mast

clearly settled with the McGuires already.

Fourth, I had no idea over a month after the meeting in Mast's office I would be given the release papers to sign and that I had all that time to think it over. I was told the McGuire deal was done and over.

I am compiling a list of the emails and documents that all show this and will need more time to complete this.

There are other changes as well but most are minor.

Thanks,
Paul

On May 28, 2019, at 6:01 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

Hi Julia,
I want to touch base because I'm reading this again and I see a few other things that perhaps should change.
I will have an email with the corrections by tomorrow morning.
Thanks,
Paul

On May 28, 2019, at 2:35 PM, Julia Williams <juliawilliams@clintonlaw.net> wrote:

Dear Paul,

Please find updated responses.

Please note that after our call I determined that we should retain Dr. Landford before disclosing him as an expert witness. We have time to do that.

As to the owner's manual—it would not be considered a photograph—the photographs of the machine in it are not the types of photographs the defendants are looking for. They want actual physical photos at the scene.

Thanks,

Julia Williams
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<Dulberg's Answers to Hans Mast's Interrogatories to Plaintiff 2019 May 28.docx><Dulberg RTP Responses 2019 May 28.docx><Dulberg Answers to Thomas Popovich Expert Interrogatories SKELETON DRAFT 2019 May 28.docx><Dulberg's Answers to Popovich Interrogatories to Plaintiff 2019 May 28.docx>

