

From: Julia Williams juliawilliams@clintonlaw.net
Subject: Re: Re: Dulberg v Mast et al; Discovery
Date: December 23, 2019 at 5:18 PM
To: Paul Dulberg pdulberg@comcast.net

JW

I will be out of the office celebrating the holidays with limited access to voicemail and email until January 3, 2020. I will reply to your message upon my return. If you have an urgent issue, please leave a voicemail at 312-508-3376.

Happy Holidays!

Julia Williams
Of Counsel
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On Jul 26, 2019, at 5:09 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

Hi Julia,
I have attached 4 files with notes for possible changes to the answers.
I thought we had this all worked out at the last court date but so much has changed since the documents we received from the defense so I tried to incorporate what was learned thus far but I have to leave it up to you to determine what is best since we are so late.
Please let me know if you need anything.
Thank you,
Paul

On Jul 23, 2019, at 4:42 PM, Julia Williams <juliawilliams@clintonlaw.net> wrote:

Dear Paul,

First, we have not completed our discovery disclosure to the other side. We need to do so. Mast and the Popovich firm sent discovery requests to you (through us) some time ago. You sent responses and then we have modified them. We need to finalize these responses and send them. I received additional time, but we are well over our time and we need to get this completed.

Attached are the responses that I sent for your review on July 2, 2019 based upon your prior changes.

Please review and respond by the end of the week.

Second, you sent a file for our review on July 8, 2019.

The file consisted of:

1. A memo outlining what was contained in the file, as well as some notes on the document production that we received from Popovich.
2. A list of documents that appear to be missing from Popovich/Mast's discovery production.
 - a. We will review the production and request supplemental information from Popovich/Mast
3. A list of documents that appear to be missing from Dulberg discovery production that we produced to the other side.
 - a. We will review the production and documents provided by you to us to determine whether these are actually missing.
4. A timeline of the Dulberg/McGuire settlement
5. A list of questions for Mast
 - a. We will keep this list for incorporation into our questioning when we are preparing for depositions.
6. Table of Contents for Mast/Popovich Document Production
7. Table of Contents for Dulberg Production
8. Emails by Date.

Thank you for providing the information. The timeline and tables of content will be especially helpful

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On Jul 2, 2019, at 5:26 PM, Julia Williams <juliawilliams@clintonlaw.net> wrote:

Dear Paul,

Attached are the updated drafts of the discovery responses for your review. There are some notes highlighted in yellow.

If you are comfortable with the answers, we will remove the notes that are not actual answers and produce them to the other side. I have your verification so I do not need that again.

I have also attached the documents that we produced to opposing counsel. Please note that we did not include documents that you produced to us that we considered privileged. We will now waive that privilege and do a supplemental production of documents, whereby we hand over more relevant documents.

Let us know if you have questions on the documents.

Best Regards,

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