

**From:** Julia Williams juliawilliams@clintonlaw.net  
**Subject:** Re: Dulberg v Popovich; Documents  
**Date:** June 26, 2020 at 4:21 PM  
**To:** Paul Dulberg pdulberg@comcast.net  
**Cc:** Mary Winch marywinch@clintonlaw.net, Ed Clinton ed@clintonlaw.net

JW

Dear Paul,

Instead of investing loads of time in rescanning and identifying each note, let's rethink this.

Within the next week, can you determine:

1. For the file titled "Notes 5.pdf" are all of the notes on that file (it is one page) written by Dr. Kathy Kujawa? If not, were they a combination of Dr. Kathy Kujawa and either you, your mother, or your brother?
2. For the depositions and remainder of the "Notes" files (Notes 1-4), are all of those notes written by either you, your brother, or your mother?
3. Did an attorney (either Gooch or one of your other attorneys during the underlying litigation) make any of the notes, either in the "Notes" files or on the deposition transcripts?

Thanks,

Julia Williams  
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On Jun 26, 2020, at 3:27 PM, Paul Dulberg <[pdulberg@comcast.net](mailto:pdulberg@comcast.net)> wrote:

Hi Julia,

Ok, I have a question but a short background first

Many of the notes are illegible probably because Gooch scanned these in as black and white yet we used different colors of pens and pencils depending on what was we had available at the time to make the notes.

I dug out the originals which are more legible but some are fading, particularly the ones made with colored pencil.

A good example of this is the gagnon deposition cover page, in Gooch's scan you can read 2 handwritten notes that were written in black ink, the other 4 notes are either missing or can't be read. On The original I can read all of it still but the ones in blue pencil seem to be fading the fastest and can barely be read at all.

Do you want me to incorporate the text of what I can still make out on the originals with who wrote them?

Thanks,  
Paul

On Jun 26, 2020, at 1:43 PM, Paul Dulberg <[pdulberg@comcast.net](mailto:pdulberg@comcast.net)> wrote:

Ok there are a lot of pages it will take more than a few minutes because 3 different people wrote these notes at various times and I need to go through page by page and give you who wrote what on what page of each pdf

I can't say how long this will take but I can tell you there is no way I can finish this today

Paul

On Jun 26, 2020, at 1:25 PM, Paul Dulberg <[pdulberg@comcast.net](mailto:pdulberg@comcast.net)> wrote:

Ok, give me a few minutes to get back to you on this

I didn't realize there was attachments

Paul

On Jun 26, 2020, at 1:22 PM, Julia Williams <[juliawilliams@clintonlaw.net](mailto:juliawilliams@clintonlaw.net)> wrote:

Dear Paul,

I hope everything is well with you and your mother.

Please take your time to review the documents that were attached to the first email and determine who wrote which notes. To be clear, when I said handwritten notes, I was specifically referring to the ones attached, thus you should be able to see the handwriting to determine who wrote the notes. I have attached them again here for ease.

To be clear, I am not asking generally who wrote various notes. I am specifically asking about who wrote the notes attached or the notes on the documents that I had attached. Thus, if that will take a number of days to determine who wrote the notes, taking the time is fine.

Here is the list of attached documents again with a bit more clarity:

1. David Gagnon Dep with Notes. Who wrote the notes on the deposition transcript?
2. Michael McArtor Dep with Notes. Who wrote the notes on the deposition transcript?
3. Paul Dulberg Dep with Notes. Who wrote the notes on the deposition transcript?
4. William McGuire Dep with Notes. Who wrote the notes on the deposition transcript?
5. Notes 1-5. Who wrote the handwritten notes from the five files of handwritten notes attached?

In addition to the four deposition transcripts, there are five files attached named (1) Notes 1.pdf, (2) Notes 2.pdf, (3) Notes 3.pdf, (4) Note 4.pdf, (5) Note 5.pdf. I specifically want to know who the author is of each note contained within the pdf document. For some of the files, it is simply one page, but others have several pages. Do your best to identify the author of each of the notes. If you do not know, simply state you do not know. If there are several do your best to describe who wrote each note within the document. One of the files contains about 100 pages—it appears that the handwriting is similar so I am hopeful that it is one author, but if not, simply do your best to identify the authors/page numbers.

Best Regards,

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On Jun 26, 2020, at 12:27 PM, Paul Dulberg <[pdulberg@comcast.net](mailto:pdulberg@comcast.net)> wrote:

Hi Julia,

On all of the depositions or on anything else, it was my mom/Barb, brother/Tom and myself.

I would need to see the handwriting on any specific note to say who wrote it.

Mom kept most of her notes on separate papers which is what I am thinking you are referring to as notes 1-5 but am not sure without seeing the writing.

Barb's notes are not the most accurate but Tom's and mine are.

All three of us went through it separately and tried to see what we could find.

Sorry I can't be more specific right now, had an issue at mom's today and have been out.

Paul

On Jun 26, 2020, at 9:40 AM, Julia Williams <[juliawilliams@clintonlaw.net](mailto:juliawilliams@clintonlaw.net)> wrote:

Dear Paul,

I am working to produce more documents to the other side as we indicated in your deposition and pursuant to our duty to continually update discovery. There appear to be some documents from the Gooch file that were not produced in discovery in the legal malpractice case and I want to make sure we have produced everything required to the other side. We are going to produce those now. Many appear to be duplicates.

I am continuing to work on the total supplemental production, but for now, I need your help with some files that I have attached.

1. David Gagnon Dep with Notes. Who wrote the notes on the deposition transcript?
2. Michael McArtor Dep with Notes. Who wrote the notes on the deposition transcript?
3. Paul Dulberg Dep with Notes. Who wrote the notes on the deposition transcript?
4. William McGuire Dep with Notes. Who wrote the notes on the deposition transcript?
5. Notes 1-5. Who wrote the handwritten notes from the five files of handwritten notes attached?

We appreciate your help with this.

Best Regards,

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