


From: Paul Dulberg pdulberg@comcast.net 
Subject: Re: Dulberg v Popovich; Documents
Date: July 1, 2020 at 11:31 AM
To: The Clinton Law Firm juliawilliams@clintonlaw.net
Cc: Mary Winch marywinch@clintonlaw.net, Ed Clinton ed@clintonlaw.net

PD

Hi Julia,

Please find the attached file named Authors of handwritten notes.txt

The attached file should be self explanatory but please let me know if you need help.

To answer your questions below it should be self explanatory in the attached file Authors of handwritten notes.txt but I will also try to generally answer them here.

1. Notes 5.pdf is all Dr. Kujawa
2. Yes
3. No

I did take new photos of each page of the depositions and compiled them into PDF's which will follow this email. Hopefully it will be in some sort of link for you to download the large pdf's

Thank you and stay safe,
Paul



Authors of
handwr...tes.txt

On Jun 26, 2020, at 4:21 PM, Julia Williams <juliawilliams@clintonlaw.net> wrote:

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
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.

On Jun 26, 2020, at 3:27 PM, Paul Dulberg <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> 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> 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> 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 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,

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 Jun 26, 2020, at 12:27 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

Hi Julia,

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

I would need to see the hand writing 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

Barbs notes are not the most accurate but Toms 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 moms today and have been out

Paul

On Jun 26, 2020, at 9:40 AM, Julia Williams <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.

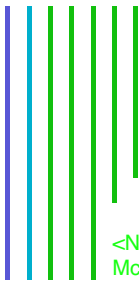
1. David Gagnon Dep with Notes. Who wrote the notes on the deposition transcript?
2. Michael McArtor Dep with Notes. Who wrote the notes on the deposition transcript?
3. Paul Dulberg Dep with Notes. Who wrote the notes on the deposition transcript?
4. William McGuire Dep with Notes. Who wrote the notes 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,

Julia Williams
Of Counsel
The Clinton Law Firm
111 W. Washington, Ste. 1437
Chicago, IL 60602
P:312.357.1515
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<David Gagnon Dep with Notes.pdf><Michael McArtor Dep With Notes.pdf><Paul Dulberg Dep with Notes.pdf>
<William McGuire Dep with Notes.pdf><Notes 2.pdf><Notes 5.pdf><Notes 4.pdf><Notes 3.pdf><Notes 1.pdf>

<Notes 1.pdf><Notes 2.pdf><Notes 3.pdf><Notes 4.pdf><Notes 5.pdf><David Gagnon Dep with Notes.pdf><Michael
McArtor Dep With Notes.pdf><Paul Dulberg Dep with Notes.pdf><William McGuire Dep with Notes.pdf>

David Gagnon Dep with Notes.pdf

1. All notes written directly on deposition – Paul Dulberg
2. Notes on separate papers belong to Barb Dulberg. PDF page numbers: 7, 9, 12, 14, 16, 18, 22, 24, 26, 33.

Michael McArtor Dep With Notes.pdf

Paul Dulberg

Notes1.pdf

Barb Dulberg

Notes 2.pdf

1-3 – Paul Dulberg

4-50 – Barb Dulberg

51-52 – Paul Dulberg

53-95 – Barb Dulberg

96 was written by Barb Dulberg with the exception of the address "1015 Oakleaf Ave McHenry, IL. 60051" which was written by Paul Dulberg

97-99 – Barb Dulberg

100 1st 2 lines – Barb Dulberg. Remainder – Paul Dulberg

101-103 – Barb Dulberg

104-106 – Paul Dulberg

Notes 3.pdf

Paul Dulberg

Notes 4.pdf

1 – Paul Dulberg

2 – Blank page

3 – Tom Kost

4 – Blank page

5 – Tom Kost

6 – Tom Kost

7 – Tom Kost

8 – Paul Dulberg

9 – Tom Kost

10 – Blank page

11 – Tom Kost

12 – Blank Page

13 – Tom Kost

14 – Blank Page

15 – Tom Kost

16 – Blank Page

17 – Paul Dulberg

18 – Blank page

19 – Paul Dulberg

20 – Paul Dulberg

21 – Paul Dulberg

22 – Blank Page

23 – Paul Dulberg

24 - Blank Page
25 - Paul Dulberg
26 - Blank page
27 - Paul Dulberg
28 - Blank Page
29 - Paul Dulberg
30 - Blank page
31 - Paul Dulberg
32 - Blank page
33 - Paul Dulberg
34 - Blank page
35-44 - Tom Kost

Notes 5.pdf
Dr Kujawa

Paul Dulberg Dep with Notes.pdf
Paul Dulberg

William McGuire Dep with Notes.pdf
Paul Dulberg

Carolyn McGuire deposition with notes.pdf
Paul Dulberg