


From: Julia Williams juliawilliams@clintonlaw.net 
Subject: Fwd: PAUL DULBERG v. THE LAW OFFICES OF THOMAS J. POPOVICH, P.C, et al. (Circuit Court of McHenry County, IL No. No. 17 LA 377)
Date: August 18, 2020 at 2:42 PM
To: Paul Dulberg pdulberg@comcast.net, Paul Dulberg paul_dulberg@comcast.net
Cc: Ed Clinton ed@clintonlaw.net, Mary Winch marywinch@clintonlaw.net, Julia Williams juliawilliams@clintonlaw.net

JW

Dear Paul,

We previously obtained an extension in time to respond to document discovery in your case—see below—to August 27. Opposing counsel is insisting on the August 27 response date.

As we are withdrawing, it is likely more appropriate for your new counsel to respond to the discovery. Alternatively, you could seek more time when the matter is before the Judge on Sept 10.

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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Begin forwarded message:

From: George Flynn <gflynn@karballaw.com>
Subject: RE: PAUL DULBERG v. THE LAW OFFICES OF THOMAS J. POPOVICH, P.C, et al. (Circuit Court of McHenry County, IL No. No. 17 LA 377)
Date: August 18, 2020 at 2:13:20 PM CDT
To: Julia Williams <juliawilliams@clintonlaw.net>
Cc: Ed Clinton <ed@clintonlaw.net>, Mary Winch <marywinch@clintonlaw.net>, Linda Walters <lwalters@KARBALLAW.com>

Julia:

This correspondence is being forwarded pursuant to Illinois Supreme Court Rule 201(k).

I just received your firm's motion to withdraw. If you could please pass along to Mr. Dulberg or his new counsel, that we must insist on the outstanding written discovery being answered by August 27, 2020 per our agreement below, it would be appreciated.

I think we have been very patient with Mr. Dulberg in responding to discovery which has been directed at his assertion of the discovery rule in this case, where he is attempting to overcome a statute of limitations defense (issues which are evident from the face of the pleadings and the applicable statutes involved).

The supplemental discovery we served merely clarified and more specifically identified

communications and documents which were the subject of prior discovery requests, and some of which were identified at Mr. Dulberg's discovery deposition taken on February 19, 2020.

Please feel free to contact me if you would like to discuss this matter.

Very truly yours,

George Flynn

Karbal | Cohen | Economou | Silk | Dunne | LLC

150 S. Wacker Drive

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Chicago, IL 60606

 P: (312) 431-3622

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 E: gflynn@karballaw.com

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From: Julia Williams <juliawilliams@clintonlaw.net>

Sent: Thursday, July 30, 2020 10:07 AM

To: George Flynn <gflynn@karballaw.com>

Cc: Ed Clinton <ed@clintonlaw.net>; Mary Winch <marywinch@clintonlaw.net>

Subject: Fwd: PAUL DULBERG v. THE LAW OFFICES OF THOMAS J. POPOVICH, P.C, et al. (Circuit Court of McHenry County, IL No. No. 17 LA 377)

Dear George,

Are you agreeable to an extension of 28 days on these answers?

Best Regards,

Julia Williams

Of Counsel

The Clinton Law Firm

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Begin forwarded message:

From: Linda Walters <lwalters@KARBALLAW.com>
Subject: PAUL DULBERG v. THE LAW OFFICES OF THOMAS J. POPOVICH, P.C, et al.
(Circuit Court of McHenry County, IL No. No. 17 LA 377)
Date: July 2, 2020 at 11:11:39 AM CDT
To: "ed@clintonlaw.net" <ed@clintonlaw.net>, "juliawilliams@clintonlaw.net" <juliawilliams@clintonlaw.net>, "Marywinch@clintonlaw.net" <Marywinch@clintonlaw.net>
Cc: George Flynn <gflynn@karballaw.com>

On behalf of George Flynn, please see the attached:

- Supplemental Request for Production to Plaintiff; and
- Notice of Service of Discovery Document – Supp. RFP to Plaintiff

Thank you.

Linda Walters

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