


From: Julia Williams juliawilliams@clintonlaw.net 
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 2:56 PM
To: Paul Dulberg pdulberg@comcast.net
Cc: Ed Clinton ed@clintonlaw.net, Mary Winch marywinch@clintonlaw.net

JW

Dear Paul,

The requests are attached again here so you can see what they are seeking.

Again, they were issued on July 2, 2020. We sent them to you that same day. They were originally due on July 30, 2020. We obtained an extension to August 27, 2020.

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

This message may be privileged and confidential. If you are not the intended recipient, please delete the email and notify the sender immediately.

On Aug 18, 2020, at 2:49 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

Hi Julia,

Please remind me,

Was this the emails and communications with Gooch that they are after or something else?

Thanks,
Paul

On Aug 18, 2020, at 2:42 PM, Julia Williams <juliawilliams@clintonlaw.net> wrote:

Dear Paul,

We previously obtained an extension info 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

Suite 1700

Chicago, IL 60606

<[phone_3aef1e25-ed01-4e86-9c05-55877d93199b.jpg](tel:3124313622)> P: (312) 431-3622

<[fax_b47779bc-2f12-4a09-9ce3-87f4947c34ef.png](tel:3124313670)> F: (312) 431-3670

<[envelope_5540fafc-2f13-4c5f-af64-a2c20113037b.png](mailto:gflynn@karballaw.com)> E: gflynn@karballaw.com

CONFIDENTIALITY NOTE:

This electronic message transmission contains information from the law firm of Karbal, Cohen, Economou, Silk & Dunne, LLC. which may be confidential or privileged. The information is intended to be for the use of the individual or entity named above. If you are not the intended recipient, please immediately delete this e-mail and be aware that any disclosure, copying, distribution or use of the contents of this information is prohibited.

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
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: 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

Karbal | Cohen | Economou | Silk | Dunne | LLC

150 S. Wacker Drive
Suite 1700
Chicago, IL 60606

<image001.jpg>

P: (312) 431-3641

<image002.png>

F: (312) 431-3670

<image003.png>

E: lwalters@KARBALLAW.com

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2691837v1 -
Notice...S).PDF

**IN THE CIRCUIT COURT OF THE TWENTY-SECOND JUDICIAL CIRCUIT
MCHENRY COUNTY, ILLINOIS**

PAUL DULBERG,)	
)	
Plaintiff,)	
)	
vs.)	No. 17 LA 377
)	
THE LAW OFFICES OF THOMAS J.)	
POPOVICH, P.C., and HANS MAST,)	
)	
Defendants.)	

**DEFENDANTS, THE LAW OFFICES OF THOMAS J. POPOVICH, P.C.'S
SUPPLEMENTAL REQUESTS FOR PRODUCTION TO PLAINTIFF**

NOW COMES Defendant, The Law Offices of Thomas J. Popovich, P.C. by and through its attorneys, Karbal, Cohen, Economou, Silk & Dunne, LLC, and pursuant to the provisions of Illinois Supreme Court Rule 214, respectfully requests Plaintiff, Paul Dulberg, to produce within 28 days at the law offices of Karbal, Cohen, Economou, Silk & Dunne, LLC, 150 South Wacker Drive, Suite 1700, Chicago, Illinois 60606, the following photographs, documents, objects, and other tangible things:

SUPPLEMENTAL PRODUCTION REQUESTS

1. Any and all documents relating to your “discovery” of any alleged breach of the standard of care or legal malpractice by Popovich or Mast, and which caused you damages or injury.

RESPONSE:

2. Any and all documents relating to any consultation or advice you received from any attorney or “legal expert” or legal malpractice expert which formed the basis for your alleged discovery of Mast’s and Popovich’s breach or breaches of the standard of care while they represented you in your claim or lawsuit against William and Caroline McGuire and David Gagnon.

RESPONSE:

3. Any and all documents regarding or reflecting advice from any attorney or legal expert, including but not limited to Tom Gooch, including but not limited to your communications with Tom Gooch in December 2016 (up to and including the date of the filing of your original complaint against Popovich and Mast), which relate to your discovery of any breach of the standard of care by Popovich or Mast and proximately caused damages or injury resulting therefrom.

RESPONSE:

4. Any and all documents regarding any damages you suffered at any time as a result of any breach of the standard of care by Popovich or Mast in their representation of you or provision of legal services to you.

RESPONSE:

5. Any and all documents which provide or form the basis for your contention that you did not discover until December 16, 2016 that you had been injured or damaged by Mast or Popovich's negligence in representing you in the claim or lawsuit against William and Caroline McGuire.

RESPONSE:

6. All documents, including letters and email communications between Tom Gooch on the one hand, and you on the other hand, regarding legal advice he provided to you on December 16, 2016 and thereafter, that you "had a malpractice case" against Popovich, as testified by you at pages 129-142 of your discovery deposition from February 19, 2020.

RESPONSE:

7. Any and all documents reflecting opinions by attorney Randy Baudin regarding the liability of the McGuire's, whether the advice or opinions were rendered at your mediation of the underlying case (on or about December 16, 2016) or prior thereto, as testified at your discovery deposition on February 19, 2020 (see page 141).

RESPONSE:

Respectfully submitted,

/s/ George K. Flynn

GEORGE K. FLYNN
KARBAL COHEN ECONOMOU SILK DUNNE, LLC

GEORGE K. FLYNN
KARBAL COHEN ECONOMOU SILK DUNNE, LLC
ARDC No. 6239349
150 So. Wacker Drive, Suite 1700
Chicago, Illinois 60606
(312) 431-3700
Attorneys for Defendants
gflynn@karballaw.com

**IN THE CIRCUIT COURT OF THE TWENTY-SECOND JUDICIAL CIRCUIT
MCHENRY COUNTY, ILLINOIS**

PAUL DULBERG,)	
)	
Plaintiff,)	
)	
vs.)	No. 17 LA 377
)	
THE LAW OFFICES OF THOMAS J.)	
POPOVICH, P.C., and HANS MAST,)	
)	
Defendants.)	

NOTICE OF SERVICE OF DISCOVERY DOCUMENTS

TO: Edward X. Clinton, Jr.
Julia C. Williams
The Clinton Law Firm
111 W. Washington Street, Suite 1437
Chicago, IL 60602
ed@clintonlaw.net
juliawilliams@clintonlaw.net
Marywinch@clintonlaw.net

PLEASE TAKE NOTICE that on the 2nd day of July 2020 we served the parties via email:

Defendant, The Law Offices of Thomas J. Popovich, P.C.'s:

- **Supplemental Requests for Production to Plaintiff;**

a copy of which is attached hereto and herewith served upon you.

Dated this 2nd day of July 2020.

KARBAL | COHEN | ECONOMOU | SILK | DUNNE | LLC

By: /s/ George K. Flynn
One of their Attorneys

GEORGE K. FLYNN (ARDC No. 6239349)
KARBAL COHEN ECONOMOU SILK DUNNE, LLC
150 So. Wacker Drive, Suite 1700
Chicago, Illinois 60606
(312) 431-3700
gflynn@karballaw.com

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing DEFENDANT'S NOTICE OF SERVICE OF DISCOVERY DOCUMENT was served upon:

Edward X. Clinton, Jr.
Julia C. Williams
The Clinton Law Firm
111 W. Washington Street, Suite 1437
Chicago, IL 60602
312-357-1515
ed@clintonlaw.net
juliawilliams@clintonlaw.net
Marywinch@clintonlaw.net

by email on July 2, 2020.

/s/ George K. Flynn
One of their Attorneys