

**From:** Julia Williams juliawilliams@clintonlaw.net  
**Subject:** Re: Dulberg v Mast et al; Discovery  
**Date:** July 23, 2019 at 4:42 PM  
**To:** Paul Dulberg pdulberg@comcast.net  
**Cc:** Ed Clinton ed@clintonlaw.net, Mary Winch marywinch@clintonlaw.net

JW

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.

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](mailto: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 Jul 2, 2019, at 5:26 PM, Julia Williams <[juliawilliams@clintonlaw.net](mailto: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,

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](mailto: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.

[Click to Download](#)

Dulberg's Answers to Popovich Interrogatories to Plaintiff 2019 July 2.docx  
35 KB

[Click to Download](#)

Dulberg Answers to Thomas Popovich Expert Interrogatories Draft 2019 July 2.docx  
26 KB

[Click to Download](#)

Dulberg RTP Resposes 2019 July 2.docx  
24 KB

[Click to Download](#)

Dulberg's Answers to Hans Mast's Interrogatories to Plaintiff 2019 July 2.docx  
21 KB

[Click to Download](#)

Dulberg Document Disclosure FINAL 2019 May 29.pdf  
457.5 MB