

**From:** Julia Williams juliawilliams@clintonlaw.net  
**Subject:** Re: Contingency  
**Date:** October 19, 2020 at 9:52 AM  
**To:** Paul Dulberg Paul\_Dulberg@comcast.net  
**Cc:** Ed Clinton ed@clintonlaw.net, Mary Winch marywinch@clintonlaw.net

JW

Dear Paul,

We will not accept your matter again.

As for the remainder of the emails that you sent, we provided you with the entire file. The documents are labeled. Anything in the folder that stated it was produced to OC—I provided the specific name in my email last week—those documents/written discovery answers were produced to OC. If it's not in that folder, it wasn't produced. There are several duplicates of documents—you should cross check it with that folder. We did produce everything we could to OC with the exception of confidential communication between you and Gooch. I believe all the other relevant and requested documents were produced.

We did not respond to the July 2020 supplemental discovery that George Flynn issued to you. I sent the requests in an email to you, but they are also on the flash drive.

Again, everything is on the flash drive, so we recommend that you look there. We wish you the best of luck.

Best regards,

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

On Oct 19, 2020, at 8:25 AM, Paul Dulberg <Paul\_Dulberg@comcast.net> wrote:

Hi Julia and Ed,

I'm sure you noticed the amount of emails I have sent.

I'm in a frantic state to find new counsel and simultaneously try to learn what I call "legalese" so I can reply to and argue Flynn's Motion on my own if need be and learn your file system.

Before I go give \$10,000 on yet another attorney, whom I don't know, I wanted to give you an option since you're already familiar with the case, know the case file and I do trust you and don't think it fair that you did all that work and may not get paid what you should if I end up hiring the wrong attorney.

In less than 3 months I will have enough cash in hand to fund this case and finish it 3x over. It will probably take less time but that is my worst case scenario as my family and I move to liquidate some assets and free up our capital rather than borrow from loan sharks.

I am hoping that you would be interested in taking back representation of this case.

Rather than hire a new attorney, I can use the \$10,000 to pay for your legal services over the next 3 months.

This gives me 3 months to make the arrangements needed to have enough funding to go all the way through.

If after 3 months I don't have the funds to finish this case, you can withdraw again.

I believe this would give both of us the best chances at recouping the money and time invested thus far.

Time is limited so please think about this and let me know in the next day or two.

Thank you,  
Paul

