



**From:** Julia C. Williams jwilliams@williamslawchicago.com    
**Subject:** Dulberg v Mast et al; Discovery and Court Order  
**Date:** February 3, 2020 at 12:54 PM  
**To:** Paul Dulberg paul\_dulberg@comcast.net, Paul Dulberg pdulberg@comcast.net  
**Cc:** marywinch@clintonlaw.net, ed@clintonlaw.net



Dear Paul,

Attached is the court order entered today setting the case to 4/3/2020 at 9 am for status of initial depositions of the party's and fact witnesses (not doctor's or experts, just people that witnessed things).

The judge mentioned today that he did a pretrial in the underlying case. This indicates that the Judge has prior knowledge and potentially a prior opinion on the case. We can consider whether we want to have the judge recuse himself (which I am sure he would happily do) or whether we simply want to move forward with this judge. At this point, he seems to be acting appropriately in the case and I am not very concerned with bias or prejudgment. I am also concerned that given that Mr. Popovich does practice in that courthouse that we could draw a judge that does have a bias toward Mr. Popovich or Mr. Mast.

It is a judgment call and we can discuss it more when we have you in to prepare for your deposition.

Please confirm you are available to complete depositions on these dates/times/locations:

Paul Dulberg, Feb. 19 at 1pm at Karbal Cohen, downtown.

Hans Mast, Feb 25 at 1pm at The Clinton Firm, downtown

We will likely also take Thomas Popovich's deposition in early March, but we do not have a date confirmed for that deposition yet.

Below are further responses in purple to your prior questions regarding the depositions and discovery:

1. Why depose me a week before Mast and give Mast the opportunity to read my deposition and formulate a strategy before he is questioned?

It would seem to be more fair to both parties to do both depositions on the same day to get at the truth.

As a general rule, the Plaintiff in the case is deposed first, then the defense. That is not always the case and it is not required by any rule. Mr. Flynn would not agree to taking the depositions on the same day. I requested that and he refused. Additionally, the logistics of preparing for both depositions on the same day and actually physically getting them both in is difficult.

The schedule as set is not out of the ordinary of regular litigation, thus I do not believe it is worth our energy to try to fight it. We will get nowhere. The judge will not reset a schedule like this to put the depositions closer together. I think it is in the best interest of the litigation to simply move forward with those dates, if they work for you.

2. I would like to meet with you and Ed at least one week prior to Mast's deposition and discuss the series of questions that I sent you last July designed to trap Mast into telling the truth or perjuring himself.

We can meet Thurs. Feb. 13 at 1pm or Tuesday, Feb. 18 to prepare for your depositions. We should plan for a couple of hours. You should read your deposition from the underlying case to prepare.

We can meet on Monday, Feb. 24 at 1pm to prepare for Hans Mast's deposition.

If you would like to resend all of your questions for Hans prior to the 24th, that would be helpful to be sure we have everything you are requesting.

3. I would prefer to find out what was redacted in the 100+ pages of blacked out documents the defense turned over during the document disclosure so we can improve our strategy and hone our questions.

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4. Do you or does the defense plan to call anyone else to be deposed?

We will depose Thomas Popovich. We will consider who else we should depose once Mast and Popovich have been deposed.

Best Regards,

Julia C. Williams  
Williams Law LLC  
111 W. Washington, Ste. 1437  
Chicago, IL 60602  
P: 312.508.3376  
F: 312.896.3946  
[www.williamslawchicago.com](http://www.williamslawchicago.com)  
jwilliams@williamslawchicago.com

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Dulberg Order  
2020 Feb 3.pdf

**From:** Paul Dulberg pdulberg@comcast.net  
**Subject:** Re: Dulberg v Mast et al; Discovery and Court Order  
**Date:** February 3, 2020 at 2:17 PM  
**To:** Julia C. Williams jwilliams@williamslawchicago.com  
**Cc:** Mary Winch marywinch@clintonlaw.net, ed@clintonlaw.net

PD

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1. Was the copy service Minuteman press located right next door to the Popovich firm?

2. I've been in printing and graphic design since 1986 and have used all sorts of copy machines over the years and I have never heard of inserting red paper at random intervals to ensure the scanning or copying occurs correctly. Have you ever run across a Xerox machine or any other copy machine that needed this?

To ensure that scanning or copying is done correctly one usually calibrates the machine prior to operation. Certainly not with red paper at random intervals during the job but with special calibration images used to calibrate the white and black points along with the levels of grey with some sort of greyscale. These special calibration images are unique by manufacturer and model of the machine and come with instructions on how to use them properly. There is also color calibration which is also done prior to using the machine for a job. There is also linearization, ex. this ensures that 1 inch actually equals 1 inch along both axis and is also done prior. In all honesty, calibrations are usually never performed by the average user. In copy shops they typically performed at the beginning of the day. In high end graphic studios they're performed before running each job. For something that's low end black and white such as the popovich job it is unlikely any calibrations were done at all.

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Did the case file have the malpractice insurance declaration pages?

Did the case file have internal organizational memos in it?

Did the case file have emails in it?

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Lol, I can go on and on on this one

Please give any copy service other than the one the Popovich firm used a call and ask if using red paper on a black and white job without grayscale is a standard operation procedure for anything before saying it makes sense and buying the BS they gave you.

Oh, what happened to the file divider excuse?

Thanks,  
Paul

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**Cc:** Mary Winch marywinch@clintonlaw.net, ed@clintonlaw.net

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Ok, I just realized I hit you with too much in this last email.  
By tomorrow I will have a formulated example of questions for the defense counsel on this.  
Sorry for shooting off the hip on this one  
Paul

On Feb 3, 2020, at 2:17 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

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**To:** Julia C. Williams [jwilliams@williamslawchicago.com](mailto:jwilliams@williamslawchicago.com)  
**Cc:** Mary Winch [marywinch@clintonlaw.net](mailto:marywinch@clintonlaw.net), [ed@clintonlaw.net](mailto:ed@clintonlaw.net)

PD

Hi Julia,

1. Are we allowed to know what copy service company did this job for Popovich?
2. Where was the case file scanned, what company and location?
3. Who is the contact person at this copy service company?
4. Who at the copy service company actually ran the job?
5. Did Popovich pay this copy service company?
6. If so may we see the receipt of payment, associated invoices and bank canceled checks or credit card receipts used to pay the invoice along with the months statement from the financial institution from which the funds were used?
7. Are we allowed to go to this copy service company and ask to see the process used?
8. Can we ask for the manufacturers name, model number and serial number of the machine used at the copy service company?
9. May we ask the manufacturer for the user/instruction manual for the equipment used?
10. May we ask the copy center manager and the employee who ran the job why he would use red paper to ensure that copy and scanning occurs correctly but then not remove them from the finished product?
11. May we ask the copy center manager and the employee who ran the job if using red paper in this fashion is recommended by the manufacturer of the equipment?
12. May we ask the copy center manager and employee who ran the job questions about why they would deviate from the equipment manufactures instructions and if this is standard practice at their company.
13. May we acquire all other customers names and contact information who have used this same copy center in the same month and the month prior and after the Popovich job was scanned/copied?
14. May we ask those customers if they too ended up with 100's of random sheets of black boxes embedded within the scans or copies they had made at the same copy center company?
15. May we ask those same customers if the copy centers explanation of extra randomly placed sheets with large black boxes was first file dividers which then morphed into red sheets of paper between the documents to ensure that scanning and copying occurred correctly?

I think you know where I am going with all this...

I think your experiencing part of what I experienced trying to get the case file away from Mast back in 2015

This is just a draft of first ideas I will have a refined point by point email tomorrow

Thanks,  
Paul

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**From:** Paul Dulberg pdulberg@comcast.net   
**Subject:** Re: Dulberg v Mast et al; Discovery and Court Order  
**Date:** February 6, 2020 at 1:05 PM  
**To:** Julia C. Williams jwilliams@williamslawchicago.com  
**Cc:** Mary Winch marywinch@clintonlaw.net, Ed Clinton ed@clintonlaw.net

PD

Hi Julia,

Sorry I had some issues this week with my mom and couldn't get back to you sooner on this.

I see we sent out a Subpoena for Joseph Olsen one of the bankruptcy trustees served October 24, 2019 to turn over documents  
Did we get anything back?

I believe Olsen was the trustee when the with the Baudin's represented me.

Also, did we ever issue subpoenas for the following peoples communications with Mast or ever get anything back if they were sent?  
Megan G Heeg - Original Bankruptcy Trustee and firm that was in contact with Mast  
Brad Balke - Short term Council after Mast - Traded dulberg Case with Mast for some dead football player named Frank Cavanaugh  
Randy and Kelly Baudin - Council who took the case to ADR after Balke and may have had communications with Mast  
Saul Ferris - Attorney who sent my copies of depositions and correspondence with Mast back to Mast.

I would have liked to have the communications with the above people before depositions.

**We can meet Thurs. Feb. 13 at 1pm or Tuesday, Feb. 18 to prepare for your depositions. We should plan for a couple of hours. You should read your deposition from the underlying case to prepare.**

Either day is good for me, Probably the closer to the deposition date the better so things stay fresh in our mind.

**We can meet on Monday, Feb. 24 at 1pm to prepare for Hans Mast's deposition.**

This date is good as well. May I bring my brother Tom to this meeting?

**If you would like to resend all of your questions for Hans prior to the 24th, that would be helpful to be sure we have everything you are requesting.**

Two files are attached named:

questions\_for\_mast.txt

timeline\_of\_mcguire\_settlement.txt

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I know earlier this week I went off on the 100+ blacked out pages. I did come up with good reasons and a good argument as to why their excuse just isn't plausible outlined below but with the timeline of depositions coming up I don't feel there is enough time to get to the bottom of this one and get to the truth if those are documents or red file dividers and may not be with the time or money it would take to explore.

I know the below points are moot but I included them to see if you think this is closer to what actually happened.

1. I'm supposed to believe that Doug Harlan at Minuteman press turned over an unfinished PDF file to the Popovich firm with 100+ batch separators that look like redactions still in it that he was supposed to have removed.
2. Ok, but then the Popovich firm didn't notice that the PDF file had 100+ extra pages than they sent to be scanned by Minuteman press that look like redactions and they turn it over to Mr Flynn's firm without opening the file and doing at the least a page count checking to see if they had everything.
3. Then, Mr Flynn's firm doesn't notice that 100+ pages look like redactions and didn't go back to Popovich to inquire about a privilege log or even about getting the file fixed before turning it over to us.

It is just not plausible to think that all 3 companies failed to check their own work and see the issues here.

4. Most modern copiers like Xerox and Konica Minolta, print out special batch separators (file dividers) to be inserted in the documents to be scanned. When the batch separator is scanned and recognized it then removes the batch separators when creating the PDF. Now we are supposed to believe that Minuteman press has working ancient copiers that probably can't be serviced anymore and Doug Harlan needed to add "red" batch separators and was supposed to manually remove them from the PDF and just forgot.
5. We've already found several documents turned over by Popovich in their disclosure PDF that do not match the case file given to Balke or the Baudin's.
6. Mast turned over a very limited number of emails between him and his client Dulberg.
7. I can go on and on here almost endlessly with document discrepancies between the file Mast turned over to subsequent council in the underlying case and the file Mast turned over to Flynn.

It is also not plausible because I know that Minuteman Press has had a long 30+ year relationship with the Popovich firm doing most if not all of the firms scanning and printing that they wouldn't know the seriousness of leaving batch separators in the finished product.

It is more plausible that Minuteman Press did exactly what the Popovich firm asked them to do because Minuteman Press has been doing Popovich's scanning and printing for 30+ years.

Why its not easily winnable?

1. Popovich indirectly owned or still owns the building minuteman press is in and they have had a 30+ year business relationship with Minuteman Press. In other words, Popovich controls the rent.

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2. Popovich's various businesses are historically Minuteman Press's largest customers. In other words, Minuteman Press would lose its primary source of income if Popovich wasn't happy.

3. To find out with 100% accuracy if their story is true or false, assuming the Minuteman Press copy machines are ancient and haven't had the 3rd party software installed to remove batch separators automatically, it would take the expert help of both Xerox and Konica Minolta to pull the hard drives from the machines at Minuteman Press and decrypt them. Identifying which machine Doug Harlan used for this job and whether or not red batch separators were actually used along with the correlating metadata that would show the date, time and all settings used for this job.

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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.

<Dulberg Order 2020 Feb 3.pdf>



questions\_for\_m  
ast.txt



timeline\_of\_mcg  
uire\_se...ent.txt



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**To:** Julia C. Williams jwilliams@williamslawchicago.com  
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PD

In the subpoenas for Mast communication I forgot to add the following  
Allstate - Perry Accardo  
Auto Owners - Ronald Barch

The Subpoenas were to find out if Mast had told anyone else, particularly the Megan Heeg trustee and Balke that this case was only worth 100k corroborating what he said to me.

Also, not in this email but in our previous emails I asked for McGuire and Gagnon asset check to see what we would have gotten from a jury trial and not the bankruptcy ordered ADR but not for Mast's actions.  
This would help us decide on the demand letter amount.

Paul

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Thanks,  
Paul

On Feb 3, 2020, at 12:54 PM, Julia C. Williams <[jwilliams@williamslawchicago.com](mailto:jwilliams@williamslawchicago.com)> wrote:

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<Dulberg Order 2020 Feb 3.pdf>





**From:** Julia C. Williams jwilliams@williamslawchicago.com  
**Subject:** Re: Dulberg v Mast et al; Discovery and Court Order  
**Date:** February 10, 2020 at 3:18 PM  
**To:** Paul Dulberg pdulberg@comcast.net  
**Cc:** Mary Winch marywinch@clintonlaw.net, ed@clintonlaw.net



Dear Paul,

See below responses in black.

Julia C. Williams  
Williams Law LLC  
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Chicago, IL 60602  
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F: 312.896.3946  
[www.williamslawchicago.com](http://www.williamslawchicago.com)  
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<Dulberg Order 2020 Feb 3.pdf>





**From:** Paul Dulberg pdulberg@comcast.net   
**Subject:** Re: Dulberg v Mast et al; Discovery and Court Order  
**Date:** February 11, 2020 at 12:10 PM  
**To:** Julia C. Williams jwilliams@williamsllawchicago.com  
**Cc:** Mary Winch marywinch@clintonlaw.net, Ed Clinton ed@clintonlaw.net

PD

Hi Julia,  
Please read below for my responses in Bold text.  
I have also attached PDF's that you already possess just for easy reference.  
I will see you on February 18, 2020 at 2 pm and February 24, 2020 at 1 pm.  
Thanks,  
Paul

On Feb 10, 2020, at 3:18 PM, Julia C. Williams <jwilliams@williamsllawchicago.com> wrote:

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See below responses in black.

Julia C. Williams  
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Megan retired. I spoke to her successor. We did subpoena those documents.

**On this one I am interested if Popovich/Mast ever responded to the requests for valuation of the case to Megan Heeg.**

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Unless you believe Brad Balke would have further information that would assist you in your claims, I don't understand the value in subpoenaing the documents.

I believe the cost may outweigh the usefulness. If there is something specific we will get from him, that we cannot get from Baudin, then we will subpoena these documents.

**I am fishing here but I believe Balke may have information on Mast/Popovich theories on valuation of and liabilities in the case.**

Balke decided to go ahead with Mast/Popovich mediation with Gagnon/Allstate for only 50k when Dulberg explicitly told Balke not to move forward with the mediation Popovich/Mast set up when Dulberg hired Balke. After taking the case the first thing Balke did was set up the exact same Mediation he was told not to do at his hiring.

Balke told Dulberg that he would not do anything more than Popovich/Mast had already arranged and suggested that Dulberg should just accept the deal Popovich/Mast arranged.

After the failed mediation, Dulberg Fired Balke for not doing what he said he would do when Dulberg hired him.

I believe that Balke did what he did because for some unknown reason. To Dulberg it seemed Balke was trying to cover for Mast/Popovich's mistakes and convince Dulberg that Popovich/Mast were correct.

More than likely whatever took place between Balke and Mast/Popovich was verbal but a few of the emails do show them communicating through a means that can be subpoenaed so we have all their written communications.

You may be right that at the point of malpractice (Late 2013 and early 2014) Balke had no role thus no value to the Popovich/Mast malpractice case before us.

I just always wondered why Balke changed direction from what he told Dulberg he would do after communicating with Popovich/Mast when getting the lean release and case file.

| Randy and Kelly Baudin - Council who took the case to ADR after Balke and may have had communications with Mast

Gooch produced what I believe was Baudin's entire file. Thus, I do not see the purpose in subpoenaing Baudin for records. Opposing counsel may wish to depose him in this case. I believe it would be worthwhile to let them do that and ask questions then.

Dulberg asked the Baudins at the onset of their representation if they had any conflicts of interest with Gagnon, McGuires, Balke or Popovich/Mast. Dulberg was told there were no conflicts of interest with any of them. After the ADR, Dulberg asked the Baudin's if they would represent Dulberg in a suit with Popovich/Mast for Malpractice.

Dulberg was told that the Baudin's did too much work with Popovich/Mast and there would be a conflict but did refer Dulberg to Gooch an attorney who specialized in malpractice.

Yesterday you sent me a copy of the Bankruptcy trustee Joe Olsen emails and their attachments. One of the attachments was SBaudinLawG16121919470.pdf, which has been attached to this email.

In that attachment, Baudins list \$1539.32 under other costs/fees for The Law offices of Thomas J. Popovich, P.C.- costs.

If Brad Balke made a deal with Popovich/Mast to release the lean and paid them for costs why would the Baudin's list them to the trustee like their costs were still outstanding?

Brad Balke costs are listed right below Popovich for the exact same amount.

Balke paid Popovich/Mast these costs.

Was I double billed and did the Popovich Firm receive Double their original costs by the Baudins?

It would be nice to see if any communications existed between the Baudin's and Popovich/Mast before any deposition took place and find out if they made the mistake of paying Popovich/Mast for costs that Balke already them paid for.

| Saul Ferris - Attorney who sent my copies of depositions and correspondence with Mast back to Mast.

What would be the purpose of the subpoena? What do you mean by "he sent copies of depositions and correspondence with Mast back to Mast?" Did he perform legal services? Did he provide advise to you?

Saul Ferris did not perform any legal services other than the free initial consultation to talk, read through the documents and review the case Dulberg had and decide if he would represent Dulberg.

Saul Ferris advised that Dulberg "attending the pretrial to at least see what kind of settlement offer is made." 03-06\_12-15\_Hans Mast2-73.pdf

I know this would be a fishing expedition. Dulberg would like to see if Popovich and Mast asked Saul Ferris to send them Dulberg's only copies of the depositions and written letters Mast had sent to Dulberg through the Mail back to Popovich/Mast's office then Mail them back to Saul Ferris to give to Dulberg.

During the Saul Ferris-Popovich/Mast mailing debacle Dulberg was limited in the amount of time to he had to hire a new attorney by the court.

The delay in getting the Depositions and written correspondence delayed Dulberg 2 months from having anything to show any possible new attorney anything from the case.

Thus, Dulberg hired Brad Balke, the only Attorney willing to represent Dulberg without seeing any documentation from the case beforehand and meeting the courts order to find new counsel.

The following emails show the 2 month period that Dulberg did not have access to his own copies.

Attached as:

03-06\_12-15\_Hans Mast2-73.pdf

03-06-15\_Hans Mast2-78.pdf

03-06-15\_Hans Mast2-79.pdf

03-20\_24-15\_Hans Mast2-64.pdf

03-20\_25-15\_Hans Mast2-63.pdf

03-20\_30-15\_Hans Mast2-62.pdf

03-20-15\_Hans Mast2-65.pdf

05-08\_09-15\_Hans Mast2-55.pdf

05-08\_12-15\_Hans Mast2-54.pdf

05-08-15\_Hans Mast2-56.pdf



One of these emails is listed as: Dulberg 001334

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Let's plan for Tuesday Feb. 18 at 2pm.

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On Feb 3, 2020, at 12:54 PM, Julia C. Williams <[jwilliams@williamslawchicago.com](mailto:jwilliams@williamslawchicago.com)> wrote:

Dear Paul,

Attached is the court order entered today setting the case to 4/3/2020 at 9 am for status of initial depositions of the party's and fact witnesses (not doctor's or experts, just people that witnessed things).

The judge mentioned today that he did a pretrial in the underlying case. This indicates that the Judge has prior knowledge and potentially a prior opinion on the case. We can consider whether we want to have the judge recuse himself (which I am sure he would happily do) or whether we simply want to move forward with this judge.

At this point, he seems to be acting appropriately in the case and I am not very concerned with bias or prejudice. I am also concerned that given that Mr. Popovich does practice in that courthouse that we could draw a judge that does have a bias toward Mr. Popovich or Mr. Mast.

It is a judgment call and we can discuss it more when we have you in to prepare for your deposition.

Please confirm you are available to complete depositions on these dates/times/locations:

Paul Dulberg, Feb. 19 at 1pm at Karbal Cohen, downtown.

Hans Mast, Feb 25 at 1pm at The Clinton Firm, downtown

We will likely also take Thomas Popovich's deposition in early March, but we do not have a date confirmed for that deposition yet.

Below are further responses in purple to your prior questions regarding the depositions and discovery:

1. Why depose me a week before Mast and give Mast the opportunity to read my deposition and formulate a strategy before he is questioned?

It would seem to be more fair to both parties to do both depositions on the same day to get at the truth.

As a general rule, the Plaintiff in the case is deposed first, then the defense. That is not always the case and it is not required by any rule. Mr. Flynn would not agree to taking the depositions on the same day. I requested that and he refused. Additionally, the logistics of preparing for both depositions on the same day and actually physically getting them both in is difficult.

The schedule as set is not out of the ordinary of regular litigation, thus I do not believe it is worth our energy to try to fight it. We will get nowhere. The judge will not reset a schedule like this to put the depositions closer together. I think it is in the best interest of the litigation to simply move forward with those dates, if they work for you.

2. I would like to meet with you and Ed at least one week prior to Mast's deposition and discuss the series of questions that I sent you last July designed to trap Mast into telling the truth or perjuring himself.

We can meet Thurs. Feb. 13 at 1pm or Tuesday, Feb. 18 to prepare for your depositions. We should plan for a couple of hours. You should read your deposition from the underlying case to prepare.

We can meet on Monday, Feb. 24 at 1pm to prepare for Hans Mast's deposition.

If you would like to resend all of your questions for Hans prior to the 24th, that would be helpful to be sure we have everything you are requesting.

3. I would prefer to find out what was redacted in the 100+ pages of blacked out documents the defense turned over during the document disclosure so we can improve our strategy and hone our questions.

I went to Mr. Popovich's office today to review the file. The blank black pages that appear to be redacted are not redacted pages. The firm sent the file out to a copy service who inserted red sheets of paper between the different documents to ensure that scanning and copying occurs correctly. I counted the pages and reviewed them—it matches up and makes sense. They did not redact any part of their file.

4. Do you or does the defense plan to call anyone else to be deposed?

We will depose Thomas Popovich. We will consider who else we should depose once Mast and Popovich have been deposed.

Best Regards,

Julia C. Williams  
Williams Law LLC  
111 W. Washington, Ste. 1437  
Chicago, IL 60602  
P: 312.508.3376  
F: 312.896.3946  
[www.williamslawchicago.com](http://www.williamslawchicago.com)  
[jwilliams@williamslawchicago.com](mailto:jwilliams@williamslawchicago.com)

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

<Dulberg Order 2020 Feb 3.pdf>



SBaudinLawG16  
121919470.pdf

From: Paul Dulberg <pdulberg@comcast.net>  
Subject: **Fwd: Injury case**  
Date: December 27, 2016 4:42:48 PM CST  
To: paul\_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>  
Date: March 12, 2015 at 1:13:59 PM CDT  
To: Saul Ferris <saulferris1@gmail.com>  
Subject: Re: Injury case

Hi Saul,

Have you already mailed the documents or can they be picked up?

Thanks,  
Paul

Paul Dulberg  
847-497-4250  
Sent from my iPad

On Mar 6, 2015, at 2:40 PM, Saul Ferris <saulferris1@gmail.com> wrote:

Hi Paul

I decided not to accept your case primarily based upon you settling with the homeowners for 5 thousand. I have mailed your file back to you. I would suggest attending the pretrial to at least see what kind of settlement offer is made. Thanks for letting me review your case. Sorry I can't help you. Best, Saul

On Mar 6, 2015 1:13 PM, "Paul Dulberg" <pdulberg@comcast.net> wrote:

Hi Saul,  
I'm sending this to see if I got your email address correct.  
Paul

Paul Dulberg  
[847-497-4250](tel:847-497-4250)  
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>  
Subject: **Fwd: Injury case**  
Date: December 27, 2016 4:46:16 PM CST  
To: paul\_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>  
Date: March 6, 2015 at 10:18:33 PM CST  
To: Saul Ferris <saulferris1@gmail.com>  
Subject: **Re: Injury case**

Hi Saul,  
Did you speak with my current attorney?  
Thank you for your time and advice.  
Paul

Paul Dulberg  
847-497-4250  
Sent from my iPad

On Mar 6, 2015, at 2:40 PM, Saul Ferris <saulferris1@gmail.com> wrote:

Hi Paul  
I decided not to accept your case primarily based upon you settling with the homeowners for 5 thousand. I have mailed your file back to you. I would suggest attending the pretrial to at least see what kind of settlement offer is made. Thanks for letting me review your case. Sorry I can't help you. Best, Saul

On Mar 6, 2015 1:13 PM, "Paul Dulberg" <pdulberg@comcast.net> wrote:

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Paul

Paul Dulberg  
[847-497-4250](tel:847-497-4250)  
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>  
Subject: **Fwd: Injury case**  
Date: December 27, 2016 4:46:47 PM CST  
To: paul\_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>  
Date: March 6, 2015 at 1:13:06 PM CST  
To: "saulferris1@gmail.com" <saulferris1@gmail.com>  
Subject: Injury case

Hi Saul,  
I'm sending this to see if I got your email address correct.  
Paul

Paul Dulberg  
847-497-4250  
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>  
Subject: **Fwd: Missing Depositions and pre-trial settlement brief**  
Date: December 27, 2016 4:28:12 PM CST  
To: paul\_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>  
Date: March 24, 2015 at 10:48:56 AM CDT  
To: Brad J Balke <brad@balkelaw.com>  
Subject: **Re: Missing Depositions and pre-trial settlement brief**

Hi Brad,  
Were you able to get everything yesterday?  
Paul

Paul Dulberg  
847-497-4250  
Sent from my iPad

On Mar 20, 2015, at 5:39 PM, Brad J Balke <brad@balkelaw.com> wrote:

I'm picking up the file from Hans on Monday. I'm sure everything will be there. Have a good weekend, Paul!

---

**From:** Paul Dulberg  
**Sent:** Friday, March 20, 2015 3:49 PM  
**To:** [brad@balkelaw.com](mailto:brad@balkelaw.com)  
**Subject:** Missing Depositions and pre-trial settlement brief

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Hi Brad,

As we discussed, I was to receive via certified US Mail depositions and communications between Hans Mast and myself from Saul Ferris an attorney in Gurnee, IL. Saul Ferris number is (847) 263-7770

I called Saul Ferris office last week and was assured they were sent. I was told to give it another week.

I called Saul Ferris office again today to find out they were mailed to and signed for at 3416 W. Elm St. McHenry, IL. by someone named Anne Oupi on March 7th. This is Hans Mast office.

I called Hans office and apparently no one by that name works there and no one knows anything about receiving the certified mail.

I'm at a loss as to how these documents were sent to the wrong place and am a bit furious because it has the memo about the pre-trial settlement you wanted to see.

Please advise.

Thank you in advance for your help with this matter,  
Paul

Paul Dulberg  
847-497-4250  
Sent from my iPad



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ans Ma...63.pdf ans Ma...62.pdf



**From:** Paul Dulberg <pdulberg@comcast.net>  
**Subject:** **Fwd: Missing Depositions and pre-trial settlement brief**  
**Date:** December 27, 2016 4:28:43 PM CST  
**To:** paul\_dulberg@comcast.net

**From:** Paul Dulberg <pdulberg@comcast.net>  
**Date:** March 20, 2015 at 3:49:42 PM CDT  
**To:** "brad@balkelaw.com" <brad@balkelaw.com>  
**Subject:** **Missing Depositions and pre-trial settlement brief**

Hi Brad,

As we discussed, I was to receive via certified US Mail depositions and communications between Hans Mast and myself from Saul Ferris an attorney in Gurnee, IL. Saul Ferris number is (847) 263-7770

I called Saul Ferris office last week and was assured they were sent. I was told to give it another week.

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Paul Dulberg  
847-497-4250  
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>  
Subject: **Fwd: Missing memo for pretrial settlement**  
Date: December 27, 2016 4:22:13 PM CST  
To: paul\_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>  
Date: May 9, 2015 at 4:32:54 PM CDT  
To: "<brad@balkelaw.com>" <brad@balkelaw.com>  
Subject: Re: Missing memo for pretrial settlement

Hi Brad,  
Hope you received 2 packages today  
Paul

On May 8, 2015, at 2:08 PM, Brad Balke <brad@balkelaw.com> wrote:

I will be at Donahue and Walsh (4310 Crystal Lake Drive office) from 9am to 11am tomorrow-can you drop it off?

-----Original Message-----

From: Paul Dulberg [mailto:pdulberg@comcast.net]  
Sent: Friday, May 08, 2015 12:34 PM  
To: <brad@balkelaw.com>  
Subject: Missing memo for pretrial settlement

Hi Brad,

Yesterday Saul Ferris office called and said they just received back the packet they mistakenly sent to Hans Mast at Popovich law firm. In it is the pretrial settlement memo you wanted to see. There is also the printed depositions of both the homeowners, the defendant and myself. I picked these up this morning. Let me know how to get these to you.

Thank you,  
Paul

Paul Dulberg  
847-497-4250  
Sent from my iPad





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From: Paul Dulberg <[pdulberg@comcast.net](mailto:pdulberg@comcast.net)>  
Subject: **Fwd: Missing memo for pretrial settlement**  
Date: December 27, 2016 4:23:35 PM CST  
To: [paul\\_dulberg@comcast.net](mailto:paul_dulberg@comcast.net)

From: Paul Dulberg <[pdulberg@comcast.net](mailto:pdulberg@comcast.net)>  
Date: May 8, 2015 at 2:21:51 PM CDT  
To: "<[brad@balkelaw.com](mailto:brad@balkelaw.com)>" <[brad@balkelaw.com](mailto:brad@balkelaw.com)>  
Subject: Re: Missing memo for pretrial settlement

Yes  
I will see you in the morning

Paul Dulberg  
847-497-4250  
Sent from my iPad

On May 8, 2015, at 2:08 PM, Brad Balke <[brad@balkelaw.com](mailto:brad@balkelaw.com)> wrote:

I will be at Donahue and Walsh (4310 Crystal Lake Drive office) from 9am to 11am tomorrow-can you drop it off?

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Paul

Paul Dulberg  
847-497-4250  
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>  
Subject: **Fwd: Missing memo for pretrial settlement**  
Date: December 27, 2016 4:24:24 PM CST  
To: paul\_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>  
Date: May 8, 2015 at 12:34:25 PM CDT  
To: "<brad@balkelaw.com>" <brad@balkelaw.com>  
Subject: Missing memo for pretrial settlement

Hi Brad,

Yesterday Saul Ferris office called and said they just received back the packet they mistakenly sent to Hans Mast at Popovich law firm.

In it is the pretrial settlement memo you wanted to see.

There is also the printed depositions of both the homeowners, the defendant and myself.

I picked these up this morning.

Let me know how to get these to you.


Thank you,  
Paul

Paul Dulberg  
847-497-4250  
Sent from my iPad







**From:** Paul Dulberg pdulberg@comcast.net   
**Subject:** Re: Dulberg v Mast et al; Discovery and Court Order  
**Date:** February 11, 2020 at 4:21 PM  
**To:** Julia C. Williams jwilliams@williamslawchicago.com  
**Cc:** Mary Winch marywinch@clintonlaw.net, ed@clintonlaw.net

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Hi Julia,  
May I get the address for Karbal Cohen, downtown?  
Thanks,  
Paul

On Feb 11, 2020, at 12:10 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

||| Paul Dulberg, Feb. 19 at 1pm at Karbal Cohen, downtown.