


From: Paul Dulberg Paul_Dulberg@comcast.net 
Subject: Re: Second Amended Complaint
Date: December 5, 2018 at 12:58 PM
To: The Clinton Law Firm juliawilliams@clintonlaw.net
Bcc: Paul Dulberg Paul_Dulberg@comcast.net

PD

Hi Julia,
It looks good to me.
I have attached a small text file with only a couple of typo corrections and a couple of comments.
Thank you,
Paul



comments on
Dulber...ec .txt

On Dec 5, 2018, at 10:33 AM, Julia Williams <juliawilliams@clintonlaw.net> wrote:

Dear Paul,

Attached please find the revised version of the second amended complaint. We will plan to file it tomorrow by morning. If you can, I request that you send further thoughts and edits by 5pm today. I have a deposition in the afternoon and cannot file it later in the day.

I reviewed your comments and edits. Overall, many were accepted. There were some, particularly the language about the bankruptcy, that I thought were unnecessary and would simply muddy the waters for the judge.

In this case, we need to show that Mast/Popovich had a duty to advise you properly and protect your interest, they failed to do that by urging you to settle with the McGuires when you could have continued with the case against them and obtained a much better result, instead you settled and were not able to recover at least \$300,000. The bankruptcy proceedings are necessary to this case. They will add color to the case and the information will definitely come out in the discovery process. That being said, I don't want to confuse the issues and the recovery by making allegations about the bankruptcy in the complaint.

Further, I don't want to increase any burden of proof we may have by making allegations that are necessary to prove our case.

I believe the number typos have been resolved, but before we file, I will definitely have Mary review for grammar and typos.

Best Regards,

Julia Williams
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<Dulberg Second Amended Complaint REDLINED 2018 Dec 5.docx>

8.) Cook County should read McHenry County

46 & 47) I do not have emails backing up these statements but myself, brother and mother were told these points in person.

My mom was sharp when these things happened but she has had some health issues since and probably won't make a good witness anymore, but you met my brother and he is good.

50. owed should be owned.

Since the judge already accepted the points below as fact are you sure you want to change some and leave others out?

It's your call

a) Failed to take such actions as were necessary during their representation of Dulberg to fix liability against the property owners of the subject property (the McGuires) who employed Gagnon, and sought the assistance of Dulberg, for example hiring a liability expert;

d.) Failed to investigate the insurance policy amounts of the McGuires and Gagnon;

e.) Incorrectly informed Dulberg that Gagnon's insurance policy was "only \$100,000.00" and no insurance company would pay close to that;

j) Coerced Dulberg, verbally and through emails. into accepting the settlement with the McGuires for \$5,000.00 by misleading him into believing that had no other choice but to accept the settlement or else "the McGuires will get out for FREE on a motion".