


**From:** Julia Williams [juliawilliams@clintonlaw.net](mailto:juliawilliams@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)  
**Date:** July 30, 2020 at 10:06 AM  
**To:** George Flynn [gflynn@karballaw.com](mailto:gflynn@karballaw.com)  
**Cc:** Ed Clinton [ed@clintonlaw.net](mailto:ed@clintonlaw.net), Mary Winch [marywinch@clintonlaw.net](mailto:marywinch@clintonlaw.net)

---



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](mailto:juliawilliams@clintonlaw.net)

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[Begin forwarded message:](#)

**From:** Linda Walters <[lwalters@KARBALLAW.com](mailto: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](mailto:ed@clintonlaw.net)" <[ed@clintonlaw.net](mailto:ed@clintonlaw.net)>, "[juliawilliams@clintonlaw.net](mailto:juliawilliams@clintonlaw.net)" <[juliawilliams@clintonlaw.net](mailto:juliawilliams@clintonlaw.net)>, "[Marywinch@clintonlaw.net](mailto:Marywinch@clintonlaw.net)" <[Marywinch@clintonlaw.net](mailto:Marywinch@clintonlaw.net)>  
**Cc:** George Flynn <[gflynn@karballaw.com](mailto: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



| P: (312) 431-3641



| F: (312) 431-3670



| E: [lwalters@KARBALLAW.com](mailto:lwalters@KARBALLAW.com)

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2691756v1 -  
Supple...tiff.PDF



2691837v1 -  
Notice...S).PDF

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**Date:** July 30, 2020 at 10:11 AM  
**To:** Julia Williams juliawilliams@clintonlaw.net  
**Cc:** Ed Clinton ed@clintonlaw.net, Mary Winch marywinch@clintonlaw.net

GF

Hi Julia. Yes, agreed.


## George Flynn


### Karbal | Cohen | Economou | Silk | Dunne | LLC

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**Date:** July 30, 2020 at 11:11:20 AM CDT

Date: July 2, 2020 at 11:11:39 AM CDT

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Cc: George Flynn <gflynn@karballaw.com>

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**To:** Julia Williams juliawilliams@clintonlaw.net  
**Cc:** Ed Clinton ed@clintonlaw.net, Mary Winch marywinch@clintonlaw.net

GF

Julia:

My pleasure. Doing well so far. I hope you and the family are well.


## George Flynn


### Karbal | Cohen | Economou | Silk | Dunne | LLC

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Of Counsel

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**Cc:** George Flynn <[gflynn@karballaw.com](mailto:gflynn@karballaw.com)>

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Thank you.

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**Date:** July 30, 2020 at 10:21 AM  
**To:** Paul Dulberg pdulberg@comcast.net  
**Cc:** marywinch@clintonlaw.net, ed@clintonlaw.net



Dear Paul,

These document requests are due today. We have obtained a 28 day extension so the responses are now due August 27, 2020. We anticipate filing our motion to withdraw. Thus, you will need your new counsel to respond or prepare your own response.

Best Regards,

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On Jul 2, 2020, at 12:10 PM, Julia Williams <[juliawilliams@clintonlaw.net](mailto:juliawilliams@clintonlaw.net)> wrote:

Dear Paul,

Opposing Counsel has tendered a supplemental request for production. Please review. A response is due by July 30, 2020.

You can begin gathering responsive documents.

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**Date:** July 30, 2020 at 1:50 PM  
**To:** The Clinton Law Firm juliawilliams@clintonlaw.net  
**Cc:** Mary Winch marywinch@clintonlaw.net, Ed Clinton ed@clintonlaw.net

PD

Hi Julia,

Thank you for getting this extended.

I'm pulling from memory here because I had a Dr's appointment today and am away from my desk

I just took your July 2 email and reviewed it.

I didn't collect the documents because I thought I had already turned over all the gooch files and emails to you and I thought we waived privilege for Boudin and you have all of that as well.

I suppose other than the last request asking for "documents" relating to a conversation between Baudin and myself when we were leaving the ADR the rest of this would be contingent on Judge Meyers decision of the objections over Gooch questioning that were raised during my deposition.

I'm still not sure how I'm supposed to have documents from a verbal conversation with Baudin.

I will look at all this again when I get home.

Thanks again,  
Paul

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**Date:** July 30, 2020 at 2:26 PM  
**To:** Paul Dulberg pdulberg@comcast.net  
**Cc:** Mary Winch marywinch@clintonlaw.net, Ed Clinton ed@clintonlaw.net

---



Dear Paul,

*Attorney-Client Privilege:*

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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)

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**Date:** July 2, 2020 at 11:11:39 AM CDT  
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**Karbal | Cohen | Economou | Silk | Dunne | LLC**  
150 S. Wacker Drive  
Suite 1700  
Chicago, IL 60606

<phone\_3aef1e25-ed01-4e86-9c05-55877d93199b.jpg>

P: (312) 431-3641

<fax\_b47779bc-2f12-4a09-9ce3-87f4947c34ef.png>

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<2691756v1 - Supplemental Request for Prod. to Plaintiff.PDF>

<2691837v1 - Notice of Service of Discovery Documents -- Supplemental RTP to Plaintiff (FS).PDF>

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**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:** July 30, 2020 at 3:13 PM  
**To:** The Clinton Law Firm juliawilliams@clintonlaw.net  
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Thank you.

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**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:** July 30, 2020 at 4:21 PM  
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**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 3, 2020 at 12:58 PM  
**To:** Paul Dulberg Paul\_Dulberg@comcast.net  
**Cc:** Mary Winch marywinch@clintonlaw.net, Ed Clinton ed@clintonlaw.net



Dear Paul,

I did a word search for "Gooch" in all the document files that our firm produced in the case. I do not see that any communications between you and Gooch were produced to Opposing Counsel.

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**From:** Linda Walters <[lwalters@KARBALLAW.com](mailto: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](mailto:ed@clintonlaw.net)>, "juliawilliams@clintonlaw.net" <[juliawilliams@clintonlaw.net](mailto:juliawilliams@clintonlaw.net)>, "Marywinch@clintonlaw.net" <[Marywinch@clintonlaw.net](mailto:Marywinch@clintonlaw.net)>  
**Cc:** George Flynn <[gflynn@karballaw.com](mailto: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

<phone\_3aef1e25-ed01-4e86-9c05-55877d93199b.jpg>

| P: (312) 431-3641

<fax\_b47779bc-2f12-4a09-9ce3-87f4947c34ef.png>

| F: (312) 431-3670

<envelope\_5540fafc-2f13-4c5f-af64-a2c20113037b.png>


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<2691756v1 - Supplemental Request for Prod. to Plaintiff.PDF>

<2691837v1 - Notice of Service of Discovery Documents -- Supplemental RTP to Plaintiff (FS).PDF>

**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 PM  
**To:** Julia Williams juliawilliams@clintonlaw.net  
**Cc:** Ed Clinton ed@clintonlaw.net, Mary Winch marywinch@clintonlaw.net, Linda Walters lwalters@KARBALLAW.com

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GF

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Best Regards,

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Of Counsel  
The Clinton Law Firm  
111 W. Washington, Ste. 1437  
Chicago, IL 60602  
P:312.357.1515  
F: 312.201.0737  
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**Date:** August 18, 2020 at 2:49 PM  
**To:** The Clinton Law Firm juliawilliams@clintonlaw.net  
**Cc:** Ed Clinton ed@clintonlaw.net, Mary Winch marywinch@clintonlaw.net

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Thanks,  
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<image001.jpg>

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**To:** Paul Dulberg pdulberg@comcast.net  
**Cc:** Ed Clinton ed@clintonlaw.net, Mary Winch marywinch@clintonlaw.net

---



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  
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Chicago, IL 60602  
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<image, 12 0000>

<image001.jpg>

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<image002.png>

F: (312) 431-3670

<image003.png>

E: [lwalters@KARBALLAW.com](mailto:lwalters@KARBALLAW.com)

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2691756v1 -  
Supple...tiff.PDF



2691837v1 -  
Notice...S).PDF

**From:** Paul Dulberg pdulberg@comcast.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 3:11 PM  
**To:** The Clinton Law Firm juliawilliams@clintonlaw.net  
**Cc:** Ed Clinton ed@clintonlaw.net, Mary Winch marywinch@clintonlaw.net

PD

Hi Julia,

Thanks again for resending those requests from George Flynn.

At this point I will not be meeting their deadline of August 27th until I have new council and/or the Judge rules that I must divulge communications with my attorney Gooch from the current case.

I'm not an attorney but I believe its common knowledge that what George Flynn is asking for is wrong and strikes at the heart of attorney/client privilege.

Kindly let Mr Flynn know he will not be receiving those answers or files until I have new counsel or the Judge rules on our objection at my deposition and orders me to turn over privileged communications.

Thanks again,  
Paul

On Aug 18, 2020, at 2:56 PM, Julia Williams <juliawilliams@clintonlaw.net> wrote:

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](mailto:juliawilliams@clintonlaw.net)

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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](mailto:juliawilliams@clintonlaw.net)

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Begin forwarded message:

**From:** George Flynn <[gflynn@karballaw.com](mailto: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](mailto:juliawilliams@clintonlaw.net)>  
**Cc:** Ed Clinton <[ed@clintonlaw.net](mailto:ed@clintonlaw.net)>, Mary Winch <[marywinch@clintonlaw.net](mailto:marywinch@clintonlaw.net)>, Linda Walters <[lwalters@KARBALLAW.com](mailto: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  
Chicago, IL 60606

Suite 1700  
Chicago, IL 60606  
<phone\_3aef1e25-ed01-4e86-9c05-55877d93199b.jpg> P: (312) 431-3622  
<fax\_b47779bc-2f12-4a09-9ce3-87f4947c34ef.png> F: (312) 431-3670  
<envelope\_5540fafc-2f13-4c5f-af64-a2c20113037b.png> E: [gflynn@karballaw.com](mailto:gflynn@karballaw.com)

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**From:** Julia Williams <[juliawilliams@clintonlaw.net](mailto:juliawilliams@clintonlaw.net)>  
**Sent:** Thursday, July 30, 2020 10:07 AM  
**To:** George Flynn <[gflynn@karballaw.com](mailto:gflynn@karballaw.com)>  
**Cc:** Ed Clinton <[ed@clintonlaw.net](mailto:ed@clintonlaw.net)>; Mary Winch <[marywinch@clintonlaw.net](mailto: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](mailto:juliawilliams@clintonlaw.net)

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Begin forwarded message:

**From:** Linda Walters <[lwalters@KARBALLAW.com](mailto: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](mailto:ed@clintonlaw.net)>, "juliawilliams@clintonlaw.net" <[juliawilliams@clintonlaw.net](mailto:juliawilliams@clintonlaw.net)>, "Marywinch@clintonlaw.net" <[Marywinch@clintonlaw.net](mailto:Marywinch@clintonlaw.net)>  
**Cc:** George Flynn <[gflynn@karballaw.com](mailto: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](mailto:lwalters@KARBALLAW.com)

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