


From: George Flynn gflynn@karballaw.com 
Subject: Dulberg v. Popovich
Date: April 30, 2020 at 11:13 AM
To: Julia Williams juliawilliams@clintonlaw.net

GF

Julia:

I hope you and your family are staying safe, healthy, and busy during these uncharted times.

The recent temporary amendment to Rule 206 (facilitating depositions during the Covid crisis), prompted me to touch base and inquire whether you may want to consider attempting to depose Hans Mast remotely in the 2nd half of May.

Otherwise, perhaps we can get a live deposition on the books for some time in June. If so, I would suggest the 2nd half of June.

Let me know what you think


George Flynn


Karbal | Cohen | Economou | Silk | Dunne | LLC

150 S. Wacker Drive

Suite 1700

Chicago, IL 60606

 P: (312) 431-3622

 F: (312) 431-3670

 E: gflynn@karballaw.com

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From: Julia Williams juliawilliams@clintonlaw.net
Subject: Re: Dulberg v. Popovich
Date: May 4, 2020 at 11:37 AM
To: George Flynn gflynn@karballaw.com



Good Morning, George,

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Let's plan for the end of June. If the "stay at home" orders get extended again, we will reconsider the "in person" v "remote" deposition.

I hope you and your family are well.

I am working remotely. If you need to call—the best remote number is 312.508.3376.

Thanks,

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

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On Apr 30, 2020, at 11:12 AM, George Flynn <gflynn@karballaw.com> wrote:

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From: Julia Williams juliawilliams@clintonlaw.net 
Subject: Fwd: Dulberg v. Popovich
Date: May 4, 2020 at 11:37 AM
To: ed@clintonlaw.net, marywinch@clintonlaw.net



FYI.

Made an executive decision on this one. I thought that if Paul wants to be present, and I am sure he will, it will be easier to communicate with him in person as opposed to a video dep.

Best,

Julia Williams
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Begin forwarded message:

From: Julia Williams <juliawilliams@clintonlaw.net>
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Date: May 4, 2020 at 11:37:06 AM CDT
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Subject: Re: Dulberg v. Popovich
Date: June 1, 2020 at 1:26 PM
To: George Flynn gflynn@karballaw.com



Great. Thanks. My day is a little chaotic, but I will try to catch you later this afternoon or, more likely tomorrow in the morning.

I did schedule CourtCall for Friday. We can coordinate an order for that when we chat.

Best Regards,

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<fax_b47779bc-2f12-4a09-9ce3-87f4947c34ef.png> F: (312) 431-3670

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gflynn@karballaw.com

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From: George Flynn gflynn@karballaw.com 
Subject: RE: Dulberg v. Popovich
Date: June 1, 2020 at 2:56 PM
To: Julia Williams juliawilliams@clintonlaw.net

GF

Ok sounds good. I am free for the rest of the day today or tomorrow until about 1:30.

773-341-8114 is my cell.


George Flynn


Karbal | Cohen | Economou | Silk | Dunne | LLC


150 S. Wacker Drive

Suite 1700

Chicago, IL 60606

 P: (312) 431-3622

 F: (312) 431-3670

 E: gflynn@karballaw.com

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From: Julia Williams <juliawilliams@clintonlaw.net>

Sent: Monday, June 1, 2020 1:27 PM

To: George Flynn <gflynn@karballaw.com>

Subject: Re: Dulberg v. Popovich

Great. Thanks. My day is a little chaotic, but I will try to catch you later this afternoon or, more likely tomorrow in the morning.

I did schedule CourtCall for Friday. We can coordinate an order for that when we chat.

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

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On May 31, 2020, at 4:14 PM, George Flynn <gflynn@karballaw.com> wrote:

Hi Julia. I think June 17 will work. Just let me know the details. For the time being, I will plan on being at Hans' office for the deposition.

I am still not sure about June 5. I may attend live, but I should be able to make a decision by Tuesday.

How about touching base on Monday regarding the deposition logistics?

If you need to call, my cell is 773-341-8114.

So far so good here. I hope you and your family are doing well. Thanks

George Flynn

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From: Julia Williams <juliawilliams@clintonlaw.net>

Sent: Friday, May 29, 2020 4:37 PM

To: George Flynn <gflynn@karballaw.com>

Subject: Re: Dulberg v. Popovich

Hi George,

How is the June 16, 17, or 18? If not, we should also be open the week after on Wednesday or Thursday—June 24, 25.

I anticipate this will be a video deposition, despite things opening back up, I think it is the safest route for everyone and given the Supreme Court rules, it makes sense to take advantage of the remote deposition option. Details to come on that. We can work that out and a time once we get the date nailed down.

I believe we have a June 5 status date. I believe we are encouraged to either use CourtCall or get an agreed order. I am happy to draft an agreed order setting out a date for close of oral fact discovery (f(1), f(2)) and setting the matter for further status, so we can submit it to the Judge prior to June 5 to avoid the date. Alternatively, I am also happy to appear via CourtCall if you intend to appear.

I hope you and your family are well.

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

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On May 4, 2020, at 11:43 AM, George Flynn
<gflynn@karballaw.com> wrote:

Thanks Julia. So far so good here.

Sounds like a plan. If you have a date in mind for late June, I have a feeling it will work for me. I can pass it along to Hans, so he can hold the date. Please also advise where you want to conduct the deposition.

Take care

George Flynn

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From: Julia Williams <juliawilliams@clintonlaw.net>

Sent: Monday, May 4, 2020 11:37 AM

To: George Flynn <gflynn@karballaw.com>

Subject: Re: Dulberg v. Popovich

Good Morning, George,

I hope you are doing well. I would prefer to do an in-person deposition given that the client will likely want to be present and that may present some issues with a video deposition. That being said, I don't want to hold this up indefinitely.

Let's plan for the end of June. If the "stay at home" orders get extended again, we will reconsider the "in person" v "remote" deposition.

I hope you and your family are well.

I am working remotely. If you need to call—the best remote number is 312.508.3376.

Thanks,

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

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On Apr 30, 2020, at 11:12 AM, George Flynn
<gflynn@karballaw.com> wrote:

Julia:

I hope you and your family are staying safe, healthy, and busy during these uncharted times.

The recent temporary amendment to Rule 206 (facilitating depositions during the Covid crisis), prompted me to touch base and inquire whether you may want to consider attempting to depose Hans Mast remotely in the 2nd half of May.

Otherwise, perhaps we can get a live deposition on the books for some time in June. If so, I would

suggest the 2nd half of June.

Let me know what you think

George Flynn

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