

Date : 3/4/2021 7:45:38 AM
From : "Paul Dulberg"
To : "Alphonse Talarico"
BCc : "Paul Dulberg"
Subject : Individual Gooch emails for privilege log

Attachments available until Apr 3, 2021

Dear Mr Talerico,

Please find the attached files.

Per our conversation you mentioned that the emails must each be listed individually in a privilege log.

I went back and found these individual files.

These individual files are what I used to make them consolidated into one pdf that you already have.

Also, note that the only Gooch Emails I could find that talk about discovery of Pecuniary injury caused by Mast and Popovich from before the complaint was filed is the following:

2017-11-22-d_Dulberg 8744-8746_Sent_Filing Fees needed prior to filing suit_Pages-3.pdf

"In addition to the corrections listed in last Wednesday's email, I'd like to know what Tom thinks about changing number 20 where it says, "DULBERG realized for the first time" to perhaps DULBERG fully realized for the first time.

My thinking is this, I started to get hints that things were wrong first from the treating Dr's, one of them, Dr Kujawa who came out and said the firm I had handling the case was asking all the Dr's the wrong questions during their depositions, then from the first bankruptcy trustee when she said that the lawyer I had handling the personal injury case was wrong about the amount the case was worth, how they handled it so far and that I should find a new lawyer, then from an attorney that I was interviewing after the Popovich firm withdrew who wrote me a letter saying he wouldn't take the case because of the way the Popovich firm released the McGuire's insurance, then when I read the chainsaw liability expert's report just before the ADR hearing where in his report he clearly put negligence on the McGuire's, then I finally and fully understood the extent of the damages of Popovich's negligence after the ADR Binding Mediation Hearing and that's when The Baudin Firm sent me to see Tom Gooch.

I'd suppose that if the Popovich insurance lawyer fights one of the key things they will try to get out of me in a deposition is when I first realized there was a problem hoping to get off on some technicality. But things are not always black and white. I was getting hints there was a problem the whole way but it only fully revealed itself to me once I met with Tom Gooch."

Hope this helps with creating a proper privilege log

Looking forward to our 8am phone meeting

Paul

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