

Date : 11/16/2021 7:36:06 AM

From : "Paul Dulberg"

To : "Alphonse Talarico"

BCc : "Paul Dulberg"

Subject : Defendants Answers - Searchable PDF Files - OCR

Attachment : 2367088v1 - Popovich & Mast_s Answer to Plaintiff_s 213(f) Rogsto Defendants-OCR.PDF; ATT00002.bin; 2367045v1 - Popovich Response to Plaintiff_s 1st Set of DocumentRequests-OCR.PDF; ATT00004.bin; 2367040v1 - Mast Response to Plaintiff_s 1st Set of Document Requests-OCR.PDF; ATT00006.bin; 2367038v1 - Mast Answer to Plaintiff_s 1st Set of Rogs to Defendants-OCR.PDF; ATT00008.bin; 2367006v1 - Popovich Answer to Plaintiff_s 1st Set of Rogs to Defendants-OCR.PDF; ATT00010.bin;

Dear Mr Talarico,

I am sending you the following files;

2367088v1 - Popovich & Mast_s Answer to Plaintiff_s 213(f) Rogs to Defendants-OCR.PDF

2367045v1 - Popovich Response to Plaintiff_s 1st Set of Document Requests-OCR.PDF

2367040v1 - Mast Response to Plaintiff_s 1st Set of Document Requests-OCR.PDF

2367038v1 - Mast Answer to Plaintiff_s 1st Set of Rogs to Defendants-OCR.PDF

2367006v1 - Popovich Answer to Plaintiff_s 1st Set of Rogs to Defendants-OCR.PDF

Please Note that I am not sending;

2367513v1 - Notice of Service of Discovery Documents -- Defendants_ Answers to Plaintiff_s Discovery.PDF

These are the documents Mr Flynn sent to you in reply to your letter about answering the original Gooch discovery requests.

It should be noted that the files I am sending you are identical to the ones Mr Flynn sent with one exception;

These files have been run through Adobe's Optical Character Recognition and have been affixed with -OCR at the end of the file names making the text searchable and selectable.

The file named: 2367513v1 - Notice of Service of Discovery Documents -- Defendants_ Answers to Plaintiff_s Discovery.PDF already is searchable text and does not need to be made searchable.

Take special note that the PDF's that Mr Flynn sent took extra effort on the authors part to make them non searchable.

These files had to be created in any kind of word processing software, rasterized (turned into a picture) and then converted to PDF's as a picture.

Mr Flynn also produced most of his document discovery in the same way.

I don't know of any word processing software available in the past 10 years that can remove the searchable/selectable text from the document when it is simply saved out or printed as a PDF without taking the extra step of rasterizing the text document into a picture.

I found these same non searchable PDF files in the Clinton File under;
Dulberg Master File
Dulberg Matter Ed Clinton
Dulberg Discovery Produced by Def

These non searchable PDF files in the Clinton File have creation dates of September 4, 2019 yet Flynn sent these to Clinton on May 29, 2019

Clinton did send Links to download these non searchable PDF's to me on October 21, 2019 almost 5 months after Flynn submitted them

They were amongst 16 links to documents to be downloaded and errors did occur in the download process.

Investigation continues on which documents erred out and I did not get, not sure if I can figure this one out or not since I seen it in the list of files when I did a search and I have installed a new operating system twice since October of 2019 and the system log files may have been overwritten.

I did not find these non searchable PDF's in any of Julia Williams files.

This doesn't mean they are not there.

They may have different file names from the originals and since they are not searchable it will be quite the undertaking to open every single file within Julia's files. This could take weeks or maybe months.

I am continuing to research my emails with the Clintons to see if any discussion around these took place and when.

I will update this and send it to you when I finish.

Also, I did not find any of the emails between Linda Walters, Mr Flynn and Julia Williams within the Clinton files that Mr Flynn sent you.

I did find many emails between them just not the ones Mr Flynn posted in his email to you.

Thank you,
Paul