

Date : 12/20/2021 8:34:49 AM

From : "Paul Dulberg"

To : "Law Office Of Alphonse Talarico"

BCc : "Paul Dulberg"

Subject : Re: March 22, 2019 - Julia Williams and Mr Flynn exchanged discovery requests and December payment for you

The Gooch discovery sent to defense counsel found within the Clinton files in 2 different locations appears to be identical so the one used as the exhibit is good to go.

On Dec 20, 2021, at 8:18 AM, Paul Dulberg <Paul_Dulberg@comcast.net> wrote:

Update:

I have no emails from Julia Williams to me that have Mr Flynn's Discovery responses. At least not with Mr Flynn's original file names.

In the next email I am going to resend you the same email I sent on November 15, 2021 to you with the emails between Julia Williams and Mr Flynn That show the progression of responding to the discovery requests and have the actual attachments with Mr Flynn's discovery answers on May 29th.

Also, I haven't compared the gooch discoveries from the file to make sure they are identical yet but am going to do that after sending the next email.

On Dec 20, 2021, at 7:58 AM, Paul Dulberg
<Paul_Dulberg@comcast.net> wrote:

Dear Mr Talarico,

Please find below the emails Julia Williams sent to me about exchanging discovery requests with Mr Flynn with the actual discovery requests attached.

This clearly shows a March 22, 2019 date.

I am still looking for the email that shows Mr Flynn's response to the Clinton discovery, I will forward it as soon as I find it.

On a side note;

My brother Tom Kost will be dropping off 3 checks at \$4,000 each totaling \$12,000.00 at your office sometime this morning.

Thank you,
Paul

Begin forwarded message:

From: Julia Williams <juliawilliams@clintonlaw.net>
Subject: Fwd: Paul Dulberg v. The Law Offices of Thomas J. Popovich, P.C., et al. (22nd Judicial Circuit of McHenry County, II No. 17 LA 377)
Date: March 22, 2019 at 4:54:14 PM CDT
To: Paul Dulberg <paul_dulberg@comcast.net>
Cc: Mary Winch <marywinch@clintonlaw.net>, Ed Clinton <ed@clintonlaw.net>

Dear Paul,

Attached is the discovery requests sent by Popovich's office to you. You need to start answering the questions as best you can. We will assist, but we need to get the facts from you.

Also, we need you to gather the documents that they request. We may have some, but if you have them, we need to get them.

Again, we will help with this, but we want you to have the information asap and to get started on it.

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

This message may be privileged and confidential. If you are not the intended recipient, please delete the email and notify the sender immediately.

Begin forwarded message:

From: Linda Walters
<lwalters@KARBALLAW.com>
Subject: Paul Dulberg v. The Law Offices of Thomas J. Popovich, P.C., et al. (22nd Judicial Circuit of McHenry County, II No. 17 LA 377)
Date: March 22, 2019 at 1:16:59 PM CDT

To: "ed@clintonlaw.net"
<ed@clintonlaw.net>,
"juliawilliams@clintonlaw.net"
<juliawilliams@clintonlaw.net>
Cc: "Marywinch@clintonlaw.net"
<Marywinch@clintonlaw.net>, George Flynn
<gflynn@karballaw.com>

On behalf of George Flynn, please see the
attached:

Defendant, The Law Offices of Thomas J.
Popovich, P.C.'s:

- Requests for Production to Plaintiff;
- Interrogatories to Plaintiff;
- Rule 213(f)(1)(2) and (3) Interrogatories to Plaintiff;
- Rule 237 Notice to Produce; and

Defendant Hans Mast's

- Interrogatories to Plaintiff
- Notice of Service of Discovery Documents – Discovery to Plaintiff

A file-stamped copy of the NOS will be forwarded
upon receipt.

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>

E: lwalters@KARBALLAW.com

CONFIDENTIALITY NOTE:

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<2316424v1 - Request for Prod. to Plaintiff.PDF>
<2316425v1 - Interrogatories to Plaintiff.PDF>
<2316426v1 - Defendants_ Expert Interrogatories - Long Form.PDF>
<2316427v1 - Rule 237 Notice to Produce.PDF>
<2316433v1 - Mast Interrogatories to Plaintiff.PDF>
<2316417v1 - Notice of Service of Discovery Documents -- Discovery to Plaintiff.PDF>

Begin forwarded message:

From: Julia Williams <juliawilliams@clintonlaw.net>
Subject: Fwd: Dulberg v Mast et al. Discovery Requests
Date: March 22, 2019 at 11:34:24 AM CDT
To: PAUL DULBERG <paul_dulberg@comcast.net>, Mary Winch <marywinch@clintonlaw.net>, Ed Clinton <ed@clintonlaw.net>

Dear Paul,
Attached please find the discovery requests we sent to opposing counsel today.

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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<Dulberg 213 interrogatories 2019 Mar 22.pdf>
<Dulberg 213 f interrogatories 2019 Mar 22.pdf>
<Dulberg 214 Doc Requests 2019 Mar 22.pdf>