

Date : 1/26/2022 11:36:36 AM

From : "Paul Dulberg"

To : "Alphonse Talarico"

BCc : "Paul Dulberg" , "Tom Kost"

Subject : Bates numbers of Case law given to Dulberg by Mast, Nov. 20, 2013

Attachment : IndependantContractor-CaseLaw1_Mast-TilshnerCase.pdf;

Dear Mr Talarico,

I have a note here from one of our conversations in the past couple of weeks that you needed the bates numbers from the case files Mast gave me before the McGuire settlement.

I don't know if I got that to you so here it is (again?).

Sorry If I already gave you this information, just wanted to be sure you got everything your seeking.

Below is from my timeline and contains the bates numbers of the requested items with one exception, The Tilschner case, which I have attached.

The tilchner case was not bates stamped by the Clinton Firm but was scanned in by Mr Gooch.

Note that none of the case laws provided to Dulberg by Mast appear in the Popovich disclosure documents but I did include below Masts memorandum of the meeting and the POP bates numbers of that memorandum.

Thank you,
Paul

2013-11-20 Popovich calls for and has meeting with Dulberg and Thomas Kost
Documents given to Dulberg during meeting (Dulberg 000204 - Dulberg 000225, Dulberg 000301 - Dulberg 000305)

Tom Kost kept a rough set of notes of this meeting (Dulberg 001217)

*** (Note: Dulberg was also given Tilshner v Spangler decision. Clinton firm did not add this to bates numbered documents yet it was scanned in by Gooch, attached to this email.

Add many notes as to the common law 318 issues raised at this meeting by Mast and the time sensitivity Mast artificially created to put pressure on Dulberg)

2013-11-20 Memorandum of meeting with Dulberg and Tom Kost - Mast to File

"On November 20, 2013, I met with Paul and his friend to discuss the McGuire's \$5,000 settlement offer and other issues with regard to this case. I also told them there is a dispute as to McGuire's liability, as they maintain that they were not directing Dave's work. Paul maintains that the McGuire's controlled everything that Dave was doing. I told him that that's not what the evidence seems to show. I told them the McGuire's could possibly get out of the case on motion, and the alternative is to accept the \$5,000 offer. Paul wants to read the deps of the McGuire's and also wants us to order his and Dave's dep to review. I agreed to do so.

By copy of this memo, I ask Sheila to order copies of Paul and Dave's deps. I think defense counsel ordered them, so all we need to do is get copies. Please let me know if the copies have not been already ordered so we don't have to order the originals."

(POP 000003)(POP 001209)

(Note: Tom Kost kept a rough set of notes of this meeting (Dulberg 001217))