

Date : 9/7/2022 9:47:52 AM
From : "Paul Dulberg"
To : "Alphonse Talarico"
BCc : "Paul Dulberg"
Subject : Fwd: Second Amended Complaint

Begin forwarded message:

From: Paul Dulberg <Paul_Dulberg@comcast.net>
Subject: Re: Second Amended Complaint
Date: December 6, 2018 at 3:35:19 PM CST
To: The Clinton Law Firm <juliawilliams@clintonlaw.net>

Hi Julia,
I'm not sure but I don't think I see the attachments.
Paul

On Dec 6, 2018, at 2:54 PM, Julia Williams
<juliawilliams@clintonlaw.net> wrote:

Dear Paul,
Attached please find a copy of the Second Amended Complaint with Exhibits and the Notice of Filing that were filed today in your matter. The following edits were made to the last draft you reviewed:

1. Paragraph 8—edited per your text file.
2. 46 & 47. No edits made. I understand your statements.
3. 50. Edits made.
4. Changes to statements of errors that were accepted by the judge:
 - a.) is now d in the filed copy
 - d.) was incorporated into b with slightly different language but same substance
 - e.) incorporated into c
 - j.) is now f.

I will be sending a second email today responding to your prior email about the statute of limitations.
If you have questions regarding the filed Second Amended Complaint, please reach out.
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 Dec 5, 2018, at 12:58 PM, Paul Dulberg
<Paul_Dulberg@comcast.net> wrote:

Hi Julia,
It looks good to me.
I have attached a small text file with only a couple of typo corrections and a couple of comments.
Thank you,
Paul

On Dec 5, 2018, at 10:33 AM, Julia Williams
<juliawilliams@clintonlaw.net> wrote:

Dear Paul,
Attached please find the revised version of the second amended complaint. We will plan to file it tomorrow by morning. If you can, I request that you send further thoughts and edits by 5pm today. I have a deposition in the afternoon and cannot file it later in the day. I reviewed your comments and edits. Overall, many were accepted. There were some, particularly the language about the bankruptcy, that I thought were unnecessary and would simply muddy the waters for the judge. In this case, we need to show that Mast/Popovich had a duty to advise you properly and protect your interest, they failed to do that by urging you to settle with the McGuires when you could have continued with the case against them and obtained a much better result, instead you settled and were not able to recover at least \$300,000. The bankruptcy proceedings are necessary to this case. They will add color to the case and the information will definitely come out in the discovery process. That being said, I don't

want to confuse the issues and the recovery by making allegations about the bankruptcy in the complaint.

Further, I don't want to increase any burden of proof we may have by making allegations that are necessary to prove our case.

I believe the number typos have been resolved, but before we file, I will definitely have Mary review for grammar and typos.

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 Second Amended Complaint

REDLINED 2018 Dec 5.docx>

<comments on Dulberg Second Amended Complaint

REDLINED 2018 Dec .txt>