

Date : 10/5/2022 10:30:03 AM
From : "Paul Dulberg"
To : "Alphonse Talarico"
BCc : "Paul Dulberg"
Subject : Fwd: Barch Documents

Begin forwarded message:

From: Ed Clinton <ed@clintonlaw.net>
Subject: Re: Barch Documents
Date: March 3, 2020 at 3:50:45 PM CST
To: Paul Dulberg <Paul_Dulberg@comcast.net>

Paul,
I'd like to make a demand to at least gain information - are they going to offer anything or not?
\$350,000 is obviously better.
Do I have your approval to make that demand?
Ed

On Feb 23, 2020, at 9:27 AM, Paul Dulberg
<Paul_Dulberg@comcast.net> wrote:

Hi Ed,
On this demand letter, I'd rather the larger number you suggested of 350,000 over 261,000 but trust you to decide which number we have to put in it.
Thanks,
Paul

On Feb 22, 2020, at 7:37 AM, Paul Dulberg
<Paul_Dulberg@comcast.net> wrote:

Hi Ed,
Assuming for a moment that if we have to litigate this in front of a judge or jury and eventually we do become limited by collateral estoppel what changed from the email below asking \$350,000 in the demand to \$261,000 now?
Thanks,
Paul

On Feb 15, 2020, at 9:45 AM, Ed Clinton
<ed@clintonlaw.net> wrote:

I was thinking more like \$350,000.

Edward X. Clinton, Jr.
The Clinton Law Firm, LLC
111 West Washington Street, Suite 1437
Chicago, IL 60602
(312) 357-1515
www.clintonlaw.net

Sent from [Mail](#) for Windows 10



From: Paul Dulberg <Paul_Dulberg@comcast.net>
Sent: Friday, February 14, 2020 7:39:32 PM
To: Ed Clinton <ed@clintonlaw.net>
Cc: Julia Williams <juliawilliams@clintonlaw.net>;
Mary Winch <marywinch@clintonlaw.net>
Subject: Re: Barch Documents

Hi Ed,
I haven't heard back so I'm assuming you just want a number.
If you need a number to start negotiating from start at 6,600,000 - 300,000 that was already paid from the ADR award.
Thats 6,300,000.
Let's see where they come in at.
Thats the number from everything I've researched over the past 9 years that a jury today would award in the underlying case.
I hope that these are for settlement purposes only because I have no intention of limiting any possible recovery.
Thanks,
Paul

On Feb 14, 2020, at 6:32 PM, Paul
Dulberg <Paul_Dulberg@comcast.net>
wrote:

Hi Ed,
Sorry for all the emails in a row but I have too many questions
How does this demand then negotiation work?
Is it true that even if they agree to some arbitrary number don't we still need to prove the McGuires and Gagnons could pay for it or is that the case only if it goes to trial?

Paul

On Feb 14, 2020, at 6:11 PM, Paul Dulberg
<Paul_Dulberg@comcast.net> wrote:

Hi Ed,
Should I hire an expert to come up with the number?
Thanks,
Paul

On Feb 14, 2020, at 5:40 PM, Paul Dulberg
<Paul_Dulberg@comcast.net> wrote:

Hi Ed,
A number is tough. In that Demand draft I was already at 3.2 in today's dollars but considering future inflated dollars, off the top of my head I would say 10x what the ADR awarded but I think what you're asking is what number would they give not to have to go through a trial. Let me ask you, in your experience

what kind
of number
will make
them really
think about
it?
This will
give me a
starting
point.
Thanks,
Paul

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indulberq@comcast.net

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