

Date : 10/5/2022 10:36:36 AM
From : "Paul Dulberg"
To : "Alphonse Talarico"
BCc : "Paul Dulberg"
Subject : Fwd: Dulberg v Mast et al

Begin forwarded message:

From: Paul Dulberg <Paul_Dulberg@comcast.net>
Subject: Re: Dulberg v Mast et al
Date: June 4, 2020 at 12:42:22 PM CDT
To: The Clinton Law Firm <juliawilliams@clintonlaw.net>
Cc: Mary Winch <marywinch@clintonlaw.net>, Ed Clinton <ed@clintonlaw.net>

Hi Julia,

I am requesting a meeting with you, Ed and my brother Tom within one week prior to Masts deposition.

Lets find a time that works for both you and Ed and schedule this in.

Also, I have 5 questions about the remote deposition:

1. Who will conduct the deposition, both you and Ed or just one of you, if only one which one?
2. If this is a video deposition may we record the actual video of the deposition and use it later at trial?
3. If this is to be an audio only deposition may we record the actual audio and use it later at trial?
4. Will Mast be in the same location as his attorney or will each of them attend from different locations?
5. If mast is not in the same location as his attorney what guarantees do we have that no one else will be present?

My concern here is coaching by Thomas Popovich or any other person with Mast that will not be in view of the camera or seen at all if this is audio only. Including coaching over text or other electronic means.

Thank you and stay safe,
Paul

On Jun 4, 2020, at 12:14 PM, Julia Williams
<juliawilliams@clintonlaw.net> wrote:

Dear Paul,

Attached is the notice of deposition for Hans Mast. June 25, 2020 at 10 am. It will be a remote deposition. You will be able to participate remotely.

We will provide more information on the logistics of that.

Best Regards,

Julia Williams
Of Counsel
The Clinton Law Firm
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Chicago, IL 60602
P:312.357.1515
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juliawilliams@clintonlaw.net

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<Dulberg Mast Notice of Deposition 2020 June 2.pdf>