

Date : 10/5/2022 10:47:43 AM
From : "Paul Dulberg"
To : "Law Office Of Alphonse Talarico"
BCc : "Paul Dulberg"
Subject : Fwd: Mast dep

Begin forwarded message:

From: Paul Dulberg <pdulberg@comcast.net>
Subject: Re: Mast dep
Date: June 25, 2020 at 1:56:31 PM CDT
To: The Clinton Law Firm <juliawilliams@clintonlaw.net>
Cc: Ed Clinton <ed@clintonlaw.net>

Is it possible to subpoena the phone records of Mast, the law odffice of Tom Popovich and myself from the phone companies?

I want to show there was no communication between us just prior to the October 22 \$7500 offer.

I don't believe there was any communication for a few weeks prior to that offer

Paul

On Jun 25, 2020, at 1:40 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

May I introduce a few cases in my past where I did actually testify in front of a judge and was found to be very credible?

It would take a trip to the county clerks office and a bit of digging to find the auto accident cases and other stuff

I was not deposed in those cases but I did testify in court

Paul

On Jun 25, 2020, at 1:32 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

Why didn't we dig into what mast believes makes a good witness?

He opened the door as an expert when he put me on a scale

of 1 to 10

I want mast in front of a jury. And I want an expert to testify

Ok I need to cool down

Thank you for today
Pau;l

On Jun 25, 2020, at 1:07 PM, Paul Dulberg
<pdulberg@comcast.net> wrote:

Why is there no actual contact between the supposed independent contractor (Gagnon) and the homeowner/chainsaw owner/ (McGuire's)?

You cannot claim someone is an independent contractor after the fact unless there is some proof he was an independent contractor before the fact

Since when do independent contractors bring no tools of their own and only use the tools of the person who contracted them? Assuming there is a contract

The only tool Gagnon provided was his own body as labor for the McGuire's, that's what employees bring to the job, not independent contractors

Ok I can go on and on here

I will wait to hear from you and get the transcripts

Paul

