

Date : 10/5/2022 10:50:47 AM
From : "Paul Dulberg"
To : "Alphonse Talarico"
BCc : "Paul Dulberg"
Subject : Fwd: Mast dep

Begin forwarded message:

From: Paul Dulberg <pdulberg@comcast.net>
Subject: Re: Mast dep
Date: June 26, 2020 at 12:59:33 PM CDT
To: The Clinton Law Firm <juliawilliams@clintonlaw.net>
Cc: Ed Clinton <ed@clintonlaw.net>, Mary Winch <marywinch@clintonlaw.net>

Hi Julia,

I was sending those because the more I thought about the things he said the hotter I got.

I finally walked away and took the night to cool down, in fact I'm walking away from it all till Monday.

I don't think its a good idea for me to comment anymore on the deep until we see it in writing

Thank you,
Paul

On Jun 25, 2020, at 4:02 PM, Julia Williams
<juliawilliams@clintonlaw.net> wrote:

Dear Paul,

Thank you for your feedback related to the deposition today. As most of your questions appear to be rhetorical, I am not actually going to address each one, instead, I will reiterate what we discussed. If you do have specific action items/items of discussion, please compile them in a single email and we can set up a time to discuss them.

As I stated in our phone call after, Mast was not testifying as to any independent recollection of the events. He stated several times that he did not recall the individual conversations and testified very generally about the advice provided throughout the representation. He stated that

he did not independently recall any of the documents presented—only that he recognized his signature and that he did either create them or cause them to be created. Meaning that he was not disputing the authenticity of the document or email, but could not expound on it. Essentially, we have the documents, but very little first hand testimony from Mast about the case.

Again, I will regroup with Ed Clinton, Jr. and we will reach out with next steps.

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

This message may be privileged and confidential. If you are not the intended recipient, please delete the email and notify the sender immediately.

On Jun 25, 2020, at 2:27 PM, Paul Dulberg
<pdulberg@comcast.net> wrote:

Why did mast feel it was appropriate to not send me the depositions as soon as he got them?

Every attorney I had since including yourself sends me the depositions as soon as they are available

I actually had to ask for the depositions 3/4 of a year after they were taken because Mast wanted me to make settlement decisions before knowing what the other parties testified to

What kind of attorney doesn't want their client to see what the other side or his own dr's testified to before making decisions?

A bad attorney is my answer

On Jun 25, 2020, at 2:21 PM, Paul Dulberg
<pdulberg@comcast.net> wrote:

Also, Mast seemed to hang a lot on one dr
whom only seen me twice for less than 10
minutes each visit and was not specialized in
dystonia while ignoring the testimonies of 2
dr's who specialize in the area and 2 more dr's
who actually performed the surgeries

I want to know why he would take the word of
one unfavorable dr over 4 favorable treating
dr's who specialized in what they testified
about

On Jun 25, 2020, at 2:07 PM, Paul
Dulberg <pdulberg@comcast.net>
wrote:

I would also like to see any proof
that the McGuires attorney drafted
or filed a motion for summary
judgement

Would this require subpoenaing
and possibly deposing McGuires
attorney to see if there was any
actual intent or threat of filing
such a motion and what grounds
they were using to threaten to file
the motion?

Paul

On Jun 25, 2020, at
1:56 PM, Paul
Dulberg
<pdulberg@comcast.
net> wrote:

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
<pdulber
g@comc
ast.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

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