

Date : 10/5/2022 11:02:28 AM

From : "Paul Dulberg"

To : "Alphonse Talarico"

BCc : "Paul Dulberg"

Subject : Fwd: Need clarification on outstanding issues before your departure

Begin forwarded message:

From: Julia Williams <juliawilliams@clintonlaw.net>

Subject: Re: Need clarification on outstanding issues before your departure

Date: July 30, 2020 at 10:05:41 AM CDT

To: Paul Dulberg <Paul_Dulberg@comcast.net>

Cc: Ed Clinton <ed@clintonlaw.net>, Mary Winch <marywinch@clintonlaw.net>

Dear Paul,

Please see my responses below.

Best Regards,

Julia Williams
Of Counsel
The Clinton Law Firm
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On Jul 29, 2020, at 1:55 PM, Paul Dulberg
<Paul_Dulberg@comcast.net> wrote:

Hi Ed and Julia,

I would like to ask a few questions before your departure from the case so I can better address some of the issues with possible new counsel.

The list below is not complete but it's a good start to issues I believe are still outstanding.

Outstanding questions on open issues for Clinton firm before departure:

1. Did you send a demand letter? If so, did we receive a response and may I get copies the demand letter and the response?

I sent you the email earlier today.

2. What happened with the objections raised during Dulberg's deposition when Dulberg was questioned about conversations with Dulberg's former counsel Gooch? Did you get a ruling or does that still need to be argued before judge Meyer?

There has been no motion practice on the issue and thus, there is no ruling. Your future counsel will need to bring that before the Judge at some point.

3. Similar to the last question, Have the objections in the Mast deposition been worked out or ruled on by judge Meyer?

There has been no motion practice on the issue and thus, there is no ruling. Your future counsel will need to bring that before the Judge at some point.

4. Did you find out who Gooch was using for an expert witness and did you contact any possible expert witnesses? If so, may I get a copy of their reports and contact information?

To the best of our knowledge, Attorney Gooch did not obtain or contact any expert witness. We do not have any copies of reports or contact information.

5. After you withdraw from this case would you be interested in some sort of limited scope representation or unbundled legal services type of role until I find new counsel and get them up to speed?

We are not interested in being involved further for the reasons outlined in our letter to you. We are happy to help provide any information necessary to get future counsel up to speed.

Again, Thank you so very much for your help with this case,
Paul