

**Date : 10/31/2022 11:12:16 AM**

**From : "Paul Dulberg"**

**To : "Alphonse Talarico"**

**BCc : "Paul Dulberg" , "Tom Kost"**

**Subject : Issues found with Clinton RESPONSE TO SUBPOENA FOR DOCUMENTS**

**Attachment : Screen Shot 2022-10-31 at 11.09.56 AM.png; Screen Shot 2022-10-31 at 11.10.04 AM.png; Screen Shot 2022-10-31 at 11.10.13 AM.png;**



IN THE TWENTY-SECOND JUDICIAL CIRCUIT  
MEADSBURY COUNTY, ILLINOIS

PAUL DULBERG,  
Plaintiff,  
vs.  
CHRISTOPHER J. LA 177  
JULIE THOMAS & MEYER  
Defendants.

MEMORANDUM FOR THE COURT  
(THIS DOCUMENT IS FOR RECORD ONLY)

Edward S. Clinton, Jr., an attorney at law, is the attorney for Defendant as follows:  
"Respondent" in response to the Subpoena for Discovery as follows:

GENERAL OBJECTIONS

Respondent objects to all requests that seek the disclosure of attorney-client communications between Respondent and their former client Paul Dulberg.

Respondent objects to all requests that seek the disclosure of attorney work product.

RESPONSES

Respondent incorporates the general objections in its responses to requests 1-7, and refers to the same as follows:

1. The original transcript stamped "Original" of the discovery deposition of Hans Mast taken in this matter on June 25, 2020, including all pages, all indexes, all exhibits and all stenographic/shorthand notes.

RESPONSE:

1

The transcript of the deposition of Hans Mast is produced with this response in pdf format and titled "Hans Mast 062520 FULL.pdf" and "Hans Mast 062520 MINI.pdf". The exhibits to the deposition are produced with Bates Stamp Dulberg Clinton Subpoena 518-50. The original transcript stamped "Original" of the discovery deposition of Hans Mast taken in this matter on June 25, 2020, including all pages, all indexes, all exhibits and all stenographic/shorthand notes. Please note that the copy demanded is a contemporaneous copy issued by U.S. Legal Support.

RESPONSE:

The transcript of the deposition of Hans Mast is produced with this response in pdf format and titled "Hans Mast 062520 FULL.pdf" and "Hans Mast 062520 MINI.pdf". The exhibits to the deposition are produced with Bates Stamp Dulberg Clinton Subpoena 518-50. The original transcript stamped "Original" of the discovery deposition of Hans Mast taken in this matter on June 25, 2020, including all pages, all indexes, all exhibits and all stenographic/shorthand notes. Please note that the copy demanded is a contemporaneous copy issued by U.S. Legal Support.

RESPONSE:

1. An exact duplicate of the original transcript stamped "Copy" of the discovery deposition of Hans Mast taken on June 25, 2020, to include but not limited to: all pages, all indexes, all exhibits and all stenographic/shorthand notes. Please note that the copy demanded is a contemporaneous copy issued by U.S. Legal Support.

RESPONSE:

The transcript of the deposition of Hans Mast is produced with this response in pdf format and titled "Hans Mast 062520 FULL.pdf" and "Hans Mast 062520 MINI.pdf". The exhibits to the deposition are produced with Bates Stamp Dulberg Clinton Subpoena 518-50. The original transcript stamped "Original" of the discovery deposition of Hans Mast taken in this matter on June 25, 2020, including all pages, all indexes, all exhibits and all stenographic/shorthand notes. Please note that the copy demanded is a contemporaneous copy issued by U.S. Legal Support.

RESPONSE:

2. An exact duplicate of the original transcript stamped "Copy" of the discovery deposition of Hans Mast taken on June 25, 2020, to include but not limited to: all pages, all indexes, all exhibits and all stenographic/shorthand notes. Please note that the copy demanded is a contemporaneous copy issued by U.S. Legal Support.

RESPONSE:

See documents Bates Stamped Dulberg Clinton Subpoena 1-677.  
See also documents produced solely to the Court for in camera inspection:  
A. Dulberg Clinton Subpoena Privileged Communication 1-13  
B. Dulberg Subpoena Work Product Privilege 1-13

5. All documents and ESI to include but not limited to: all text messages, emails, reports, notes, and reports taken, created, or received concerning the discovery deposition of Hans Mast taken on June 25, 2020.

RESPONSE:

See documents Bates Stamped Dulberg Clinton Subpoena 1-677.  
See also documents produced solely to the Court for in camera inspection:  
A. Dulberg Clinton Subpoena Privileged Communication 1-13  
B. Dulberg Subpoena Work Product Privilege 1-13

2

See documents Bates Stamped Dulberg Clinton Subpoena 1-677.  
See also documents produced solely to the Court for in camera inspection:  
A. Dulberg Clinton Subpoena Privileged Communication 1-13  
B. Dulberg Subpoena Work Product Privilege 1-13

6. All documents and ESI to include but not limited to: all text messages, emails, reports, notes, and reports taken, created, or received concerning the discovery deposition of Hans Mast taken on June 25, 2020.

RESPONSE:

See documents Bates Stamped Dulberg Clinton Subpoena 1-677.  
See also documents produced solely to the Court for in camera inspection:  
A. Dulberg Clinton Subpoena Privileged Communication 1-13  
B. Dulberg Subpoena Work Product Privilege 1-13

7. All documents and ESI to include but not limited to: all text messages, emails, reports, notes, and reports taken, created, or received concerning the discovery deposition of Hans Mast taken on June 25, 2020.

RESPONSE:

See documents Bates Stamped Dulberg Clinton Subpoena 1-677.  
See also documents produced solely to the Court for in camera inspection:  
A. Dulberg Clinton Subpoena Privileged Communication 1-13  
B. Dulberg Subpoena Work Product Privilege 1-13

8. All documents and ESI to include but not limited to: all text messages, emails, reports, notes, and reports taken, created, or received concerning the discovery deposition of Hans Mast taken on June 25, 2020.

RESPONSE:

See documents Bates Stamped Dulberg Clinton Subpoena 1-677.  
See also documents produced solely to the Court for in camera inspection:  
A. Dulberg Clinton Subpoena Privileged Communication 1-13  
B. Dulberg Subpoena Work Product Privilege 1-13

9. All documents and ESI to include but not limited to: all text messages, emails, reports, notes, and reports taken, created, or received concerning the discovery deposition of Hans Mast taken on June 25, 2020.

RESPONSE:

See documents Bates Stamped Dulberg Clinton Subpoena 1-677.  
See also documents produced solely to the Court for in camera inspection:  
A. Dulberg Clinton Subpoena Privileged Communication 1-13  
B. Dulberg Subpoena Work Product Privilege 1-13

3

The undersigned certifies under penalty of perjury as provided by law pursuant to the Illinois Code of Judicial Administration, 10 ILCS 10-1-10, that the statements checked below are true and correct.

Check one (1) from the following:

☐ After making a diligent search of any and all records in my possession or control, I certify that all records are as shown or submitted herewith in response to this subpoena.

☐ After making a diligent search of any and all records, I certify there are no records or records in response to this subpoena.

Check one (1) from the following:

☐ The records produced in response to this subpoena were kept in the custody of the undersigned or a representative of the undersigned.

☐ The records produced in response to this subpoena were kept in the custody of a representative of the undersigned or a representative of the undersigned.

☐ The records produced in response to this subpoena were kept in the custody of a representative of the undersigned or a representative of the undersigned.

The transcript of the deposition of Hans Mast is produced with this response in pdf format and titled "Hans Mast 062520 FULL.pdf" and "Hans Mast 062520 MINI.pdf". The exhibits to the deposition are produced with Bates Stamp Dulberg Clinton Subpoena 518-50. The original transcript stamped "Original" of the discovery deposition of Hans Mast taken in this matter on June 25, 2020, including all pages, all indexes, all exhibits and all stenographic/shorthand notes. Please note that the copy demanded is a contemporaneous copy issued by U.S. Legal Support.

2. An exact duplicate of the original transcript stamped "Copy" of the discovery deposition of Hans Mast taken on June 25, 2020, to include but not limited to: all pages, all indexes, all exhibits and all stenographic/shorthand notes. Please note that the copy demanded is a contemporaneous copy issued by U.S. Legal Support.

RESPONSE:

The transcript of the deposition of Hans Mast is produced with this response in pdf format and titled "Hans Mast 062520 FULL.pdf" and "Hans Mast 062520 MINI.pdf". The exhibits to the deposition are produced with Bates Stamp Dulberg Clinton Subpoena 518-50. The original transcript stamped "Original" of the discovery deposition of Hans Mast taken in this matter on June 25, 2020, including all pages, all indexes, all exhibits and all stenographic/shorthand notes. Please note that the copy demanded is a contemporaneous copy issued by U.S. Legal Support.

3. An exact duplicate of the original transcript stamped "Copy" in condensed form of the discovery deposition of Hans Mast taken on June 25, 2020, to include but not limited to: all pages, all indexes, all exhibits and all stenographic/shorthand notes. Please note that the copy demanded is a contemporaneous version issued by U.S. Legal Support.

RESPONSE:

The transcript of the deposition of Hans Mast is produced with this response in pdf format and titled "Hans Mast 062520 FULL.pdf" and "Hans Mast 062520 MINI.pdf". The exhibits to the deposition are produced with Bates Stamp Dulberg Clinton Subpoena 518-50. The original transcript stamped "Original" of the discovery deposition of Hans Mast taken in this matter on June 25, 2020, including all pages, all indexes, all exhibits and all stenographic/shorthand notes. Please note that the copy demanded is a contemporaneous copy issued by U.S. Legal Support.

4. All documents and ESI to include but not limited to: all text messages, emails, reports, notes, and reports taken, created, or received concerning the discovery deposition of Hans Mast taken on June 25, 2020.

RESPONSE:

See documents Bates Stamped Dulberg Clinton Subpoena 1-677.

See also documents produced solely to the Court for in camera inspection:  
A. Dulberg Clinton Subpoena Privileged Communication 1-13  
B. Dulberg Subpoena Work Product Privilege 1-13

5. All documents and ESI to include but not limited to: all text messages, emails, reports, notes, and reports taken, created, or received concerning the discovery deposition of Hans Mast taken on June 25, 2020.

RESPONSE:

Highlighted text:  
Since Clinton did not previously produce any documents I don't believe this shows the same issue as Williams responses to 4-7 except that Clinton is missing original 12 documents that Williams produced on 9/29/2022

## Dulberg Clinton Subpoena...

IN THE TWENTY-SECOND JUDICIAL CIRCUIT  
MCLENNAN COUNTY, ILLINOIS

PAUL DULBERG,  
Plaintiff,  
vs.  
CHRISTOPHER J. LAITZ  
JULIA L. CLAYTON, et al.  
Defendants.

MEMORANDUM FOR THE COURT  
(THIS SUBPOENA IS FOR RECORD ONLY.)

Edward S. Clinton, Jr., an attorney at Clinton Law Firm, LLC (Clinton),  
Respondent's request to the Subpoena for Discovery is as follows:

**GENERAL OBJECTIONS**

Respondent objects to all requests that seek the disclosure of attorney-client communications between Respondent and their former client Paul Dulberg.  
Respondent objects to all requests that seek the disclosure of attorney work product.

**RESPONSES**

Respondent incorporates the general objections in its responses to requests 1-7, and further responds as follows:

1. The original document stamped "Original" of the discovery deposition of Hans Mast taken in this matter on June 25, 2020, including all pages, all exhibits, all affidavits, and all correspondence thereto.

2. As an exact duplicate of the original document stamped "Copy" of the discovery deposition of Hans Mast taken on June 25, 2020, to include but not limited to all pages, all exhibits, all affidavits, and all correspondence thereto. These copies are the copies submitted to a contemporaneous copy made by U.S. Legal Support.

1

The transcript of the deposition of Hans Mast is produced with this response in pdf format and also as a hard copy of the transcript of the deposition of Hans Mast taken in this matter on June 25, 2020, including all pages, all exhibits, all affidavits, and all correspondence thereto. These copies are the copies submitted to a contemporaneous copy made by U.S. Legal Support.

**RESPONSES**

1. The transcript of the deposition of Hans Mast is produced with this response in pdf format and also as a hard copy of the transcript of the deposition of Hans Mast taken in this matter on June 25, 2020, including all pages, all exhibits, all affidavits, and all correspondence thereto. These copies are the copies submitted to a contemporaneous copy made by U.S. Legal Support.

2. As an exact duplicate of the original document stamped "Copy" of the discovery deposition of Hans Mast taken on June 25, 2020, to include but not limited to all pages, all exhibits, all affidavits, and all correspondence thereto. These copies are the copies submitted to a contemporaneous copy made by U.S. Legal Support.

**RESPONSES**

See documents Bates Stamped Dulberg Clinton Subpoena 1-677.  
See also documents produced solely to the Court for in camera inspection.  
A. Dulberg Clinton Subpoena Privileged Communication 1-13  
B. Dulberg Subpoena Work Product Privilege 1-13

2

See documents Bates Stamped Dulberg Clinton Subpoena 1-677.  
See also documents produced solely to the Court for in camera inspection.  
A. Dulberg Clinton Subpoena Privileged Communication 1-13  
B. Dulberg Subpoena Work Product Privilege 1-13

**RESPONSES**

See documents Bates Stamped Dulberg Clinton Subpoena 1-677.  
See also documents produced solely to the Court for in camera inspection.  
A. Dulberg Clinton Subpoena Privileged Communication 1-13  
B. Dulberg Subpoena Work Product Privilege 1-13

**RESPONSES**

See documents Bates Stamped Dulberg Clinton Subpoena 1-677.  
See also documents produced solely to the Court for in camera inspection.  
A. Dulberg Clinton Subpoena Privileged Communication 1-13  
B. Dulberg Subpoena Work Product Privilege 1-13

**Affidavit of Compliance**

The undersigned certifies under penalties of perjury as provided by the Illinois Code of Civil Procedure, 735 ILCS 5/1-109, that the statements included herein are true and correct.

Check one (1) from the following:

☒ After making a diligent search of any and all the records in our possession or control, I certify that all records we have on the above are submitted herewith in response to this subpoena.

☐ After making a diligent search of any and all records, I certify there are no records to provide in response to this subpoena.

Check one (1) from the following:

☒ I have personal knowledge of the foregoing provisions of the Illinois Code of Civil Procedure, 735 ILCS 5/1-109, that the statements included herein are true and correct.

☐ I am an employee of an attorney at Clinton Law Firm, LLC, and I have personal knowledge of the foregoing provisions of the Illinois Code of Civil Procedure, 735 ILCS 5/1-109, that the statements included herein are true and correct.

☐ I have personal knowledge of the foregoing provisions of the Illinois Code of Civil Procedure, 735 ILCS 5/1-109, that the statements included herein are true and correct.

3

**Affidavit of Compliance**

The undersigned certifies under penalties of perjury as provided by the Illinois Code of Civil Procedure, 735 ILCS 5/1-109, that the statements included herein are true and correct.

Check one (1) from the following:

☒ After making a diligent search of any and all the records in our possession or control, I certify that all records we have on the above are submitted herewith in response to this subpoena.

☐ After making a diligent search of any and all records, I certify there are no records to provide in response to this subpoena.

Check one (1) from the following:

☒ I have personal knowledge of the foregoing provisions of the Illinois Code of Civil Procedure, 735 ILCS 5/1-109, that the statements included herein are true and correct.

☐ I am an employee of an attorney at Clinton Law Firm, LLC, and I have personal knowledge of the foregoing provisions of the Illinois Code of Civil Procedure, 735 ILCS 5/1-109, that the statements included herein are true and correct.

☐ I have personal knowledge of the foregoing provisions of the Illinois Code of Civil Procedure, 735 ILCS 5/1-109, that the statements included herein are true and correct.



## Dulberg Clinton Subpoena Resp...

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Dulberg Clinton Subpoena Response 2022 Oct 28.

SECRET

See documents Bates Stamped Dulberg Clinton Subpoena 1-677.

See also documents produced solely to the Court for in camera inspection.

A. Dulberg Clinton Subpoena Privileged Communication 1-13

B. Dulberg Subpoena Work Product Privilege 1-13

6. All documents and ESI to include but not limited to: all text messages, emails, notes, and reports taken, created, or received concerning the exhibit titled "discovery deposition of Hans Mast taken on June 25, 2020."

RESPONSE:

See documents Bates Stamped Dulberg Clinton Subpoena 1-677.

See also documents produced solely to the Court for in camera inspection.

A. Dulberg Clinton Subpoena Privileged Communication 1-13

B. Dulberg Subpoena Work Product Privilege 1-13

7. All documents and ESI to include but not limited to: all text messages, emails, notes, and reports taken, created, or received concerning Exhibits 1-11 and discovery deposition of Hans Mast taken on June 25, 2020.

RESPONSE:

See documents Bates Stamped Dulberg Clinton Subpoena 1-677.

See also documents produced solely to the Court for in camera inspection.

A. Dulberg Clinton Subpoena Privileged Communication 1-13

B. Dulberg Subpoena Work Product Privilege 1-13

## Affidavit of Compliance

The undersigned certifies under penalties of perjury as provided by the Illinois Code of Civil Procedure, 735 ILCS 5/1-109, that the statements included herein are true and correct.

Check one (1) from the following:

☒ After making a diligent search of any and all the records in our possession or control, I certify that all records we have on the above are submitted herewith in response to this subpoena.

☐ After making a diligent search of any and all records, I certify there are no records to provide in response to this subpoena.

Check one (1) from the following:

3



