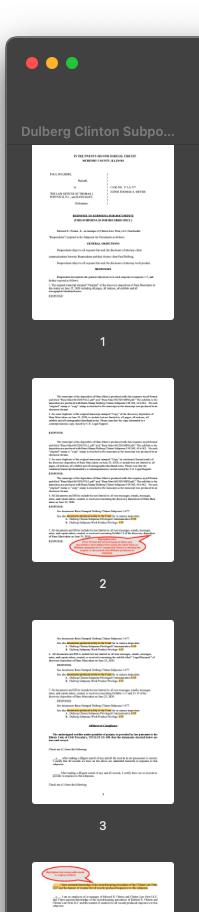
Date: 10/31/2022 11:12:16 AM

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;



**Dulberg Clinton Subponea Resp...**Page 2 of 4 — Edited

i





Dulberg Clinton Subponea Response 2022 Oct 28

The transcript of the deposition of Hans Mast is produced with this and titled "Hans Mast 062520 FULL.pdf" and "Hans Mast 062520 MINI.pd deposition are produced with Bates Stamp Dulberg Clinton Subpoena 518-5 "original" stamp or "copy" stamp is attached to the transcript as the transcript electronic format.

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

## RESPONSE:

The transcript of the deposition of Hans Mast is produced with this and titled "Hans Mast 062520 FULL.pdf" and "Hans Mast 062520 MINI.pd deposition are produced with Bates Stamp Dulberg Clinton Subpoena 518-5 "original" stamp or "copy" stamp is attached to the transcript as the transcript electronic format.

3. An exact duplicate of the original transcript stamped "Copy" in condense the discovery deposition of Hans Mast taken on June 25, 2020, to include b pages, all indexes, all exhibits and all stenographic/shorthand notes. Please condensed transcript demanded is a contemporaneous version issued by U.S.

# RESPONSE:

The transcript of the deposition of Hans Mast is produced with this and titled "Hans Mast 062520 FULL.pdf" and "Hans Mast 062520 MINI.pd deposition are produced with Bates Stamp Dulberg Clinton Subpoena 518-5 "original" stamp or "copy" stamp is attached to the transcript as the transcript electronic format.

4. All documents and ESI to include but not limited to: all text messages, er notes, and reports taken, created, or received concerning the discovery depotaken 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 inspe

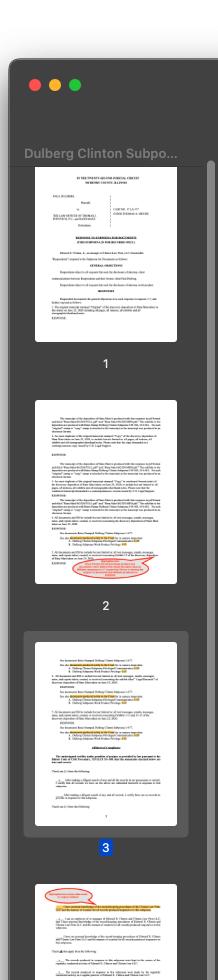
- A. Dulberg Clinton Subpoena Privileged Communication 1.
- B. Dulberg Subpoena Work Product Privilege 1-13

5. All documents and ESI to include but not limited to: all text messages, er notes, and reports taken, created, or received concerning Exhibit 12 of the d 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 issu Williams responses to 4-7 except that Clinton is miss original 12 documents that Williams produced of 9/29/2022



**Dulberg Clinton Subponea Resp...** Page 3 of 4 — Edited



Dulberg Clinton Subponea Response 2022 Oct 28

See documents Bates Stamped Dulberg Clinton Subpoena 1-677.

See also documents produced solely to the Court for in camera inspe

- A. Dulberg Clinton Subpoena Privileged Communication 1
- B. Dulberg Subpoena Work Product Privilege 1-13
- 6. All documents and ESI to include but not limited to: all text messages, e 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.
- B. Dulberg Subpoena Work Product Privilege 1-13
- 7. All documents and ESI to include but not limited to: all text messages, er 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 inspe

- A. Dulberg Clinton Subpoena Privileged Communication 1.
- B. Dulberg Subpoena Work Product Privilege 1-13

#### **Affidavit of Compliance**

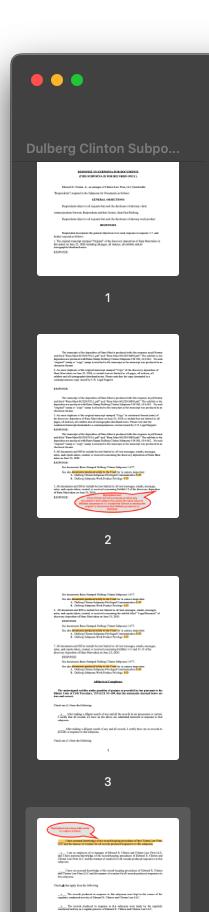
The undersigned certifies under penalties of perjury as provided by Illinois Code of Civil Procedure, 735 ILCS 5/1-109, that the statement true and correct.

Check one (1) from the following:

After making a diligent search of any and all the records in our I certify that all records we have on the above are submitted herewi subpoena.

After making a diligent search of any and all records, I certify t provide in response to this subpoena.

Check one (1) from the following:



**Dulberg Clinton Subponea Resp...** Page 4 of 4 — Edited Dulberg Clinton Subponea Response 2022 Oct 28 provide in response to this subpoena. Check one (1) from the following: 3 Highlighted text shows edits made to original affidavit

I have personal knowledge of the record-keeping procedures of t LLC and the manner of creation for all records produced responsive to t

I am an employee of or manager of Edward X. Clinton and Cl and I have personal knowledge of the record-keeping procedures of E Clinton Law Firm LLC and the manner of creation for all records produ

I have no personal knowledge of the record-keeping procedures and Clinton Law Firm LLC and the manner of creation for all records p this subpoena.

Check all that apply from the following:

The records produced in response to this subpoena were kep regularly conducted activity of Edward X. Clinton and Clinton Law LL

The records produced in response to this subpoena were m conducted activity as a regular practice of Edward X. Clinton and Clinton

The records produced in response to this subpoena were made the occurrences set forth by, or from information transmitted by, a pers the matters set forth within the records.

Date: October 28, 2022

Position: <u>Attorney/Manager</u>

The Edward Clinton we subpoenaed is not a Jr.

Name: Edward X. Clinton, J

EDIX at

(Signature)