

Dulberg Deposition Note 2/19/2020

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2/19/2020

Dulberg - dep
George Flynn

• 2002 - traffic accident Woodstock, personal injury car accident -
insurance claim mess something.

• Corporate lawyer for the business

June 28, 2011 - 41 @ time.

Military - Army National Guard - IL.
'88-'89 - '92-'93

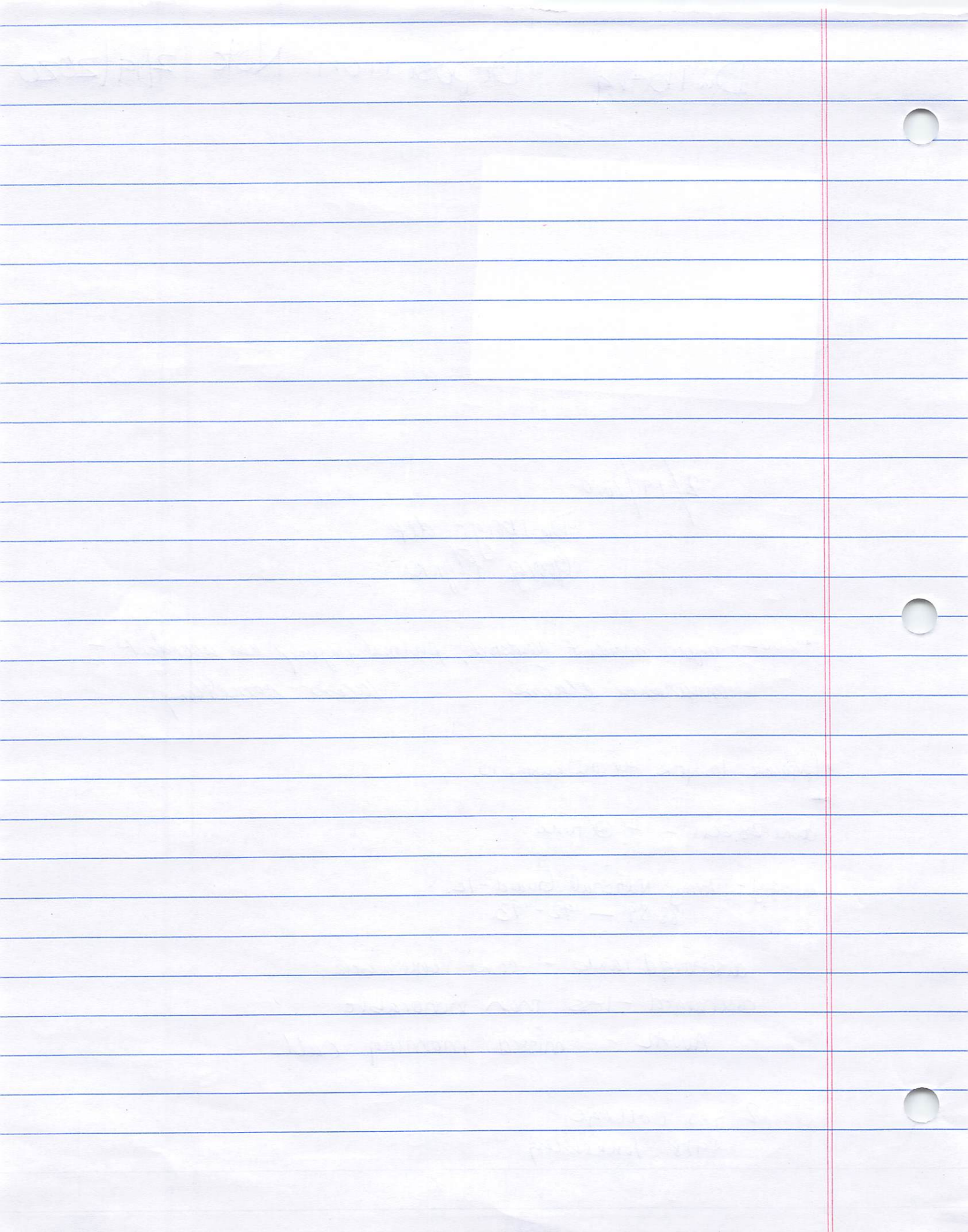
discharged rank - can't remember.

discharged - less than honorable

AWAL - missed morning call.

2 yrs college

1988 Jonesburg



2011-fee debt

McHenry County College.
McHenry College

Original Justice
Scm.

General Shuler.

Gagnon - met thru mutual friend 1990

Let to van Huisburg

Sharp Printing ~1999 - 2011

partner. 11 Corp.

stockholder - Mike Werthe.

Scott Dauling, Hubert Dauling, Paul Dauling,

~1999 - lawyer, husband.
McAndrews, McHenry
Patrick McAndrews.

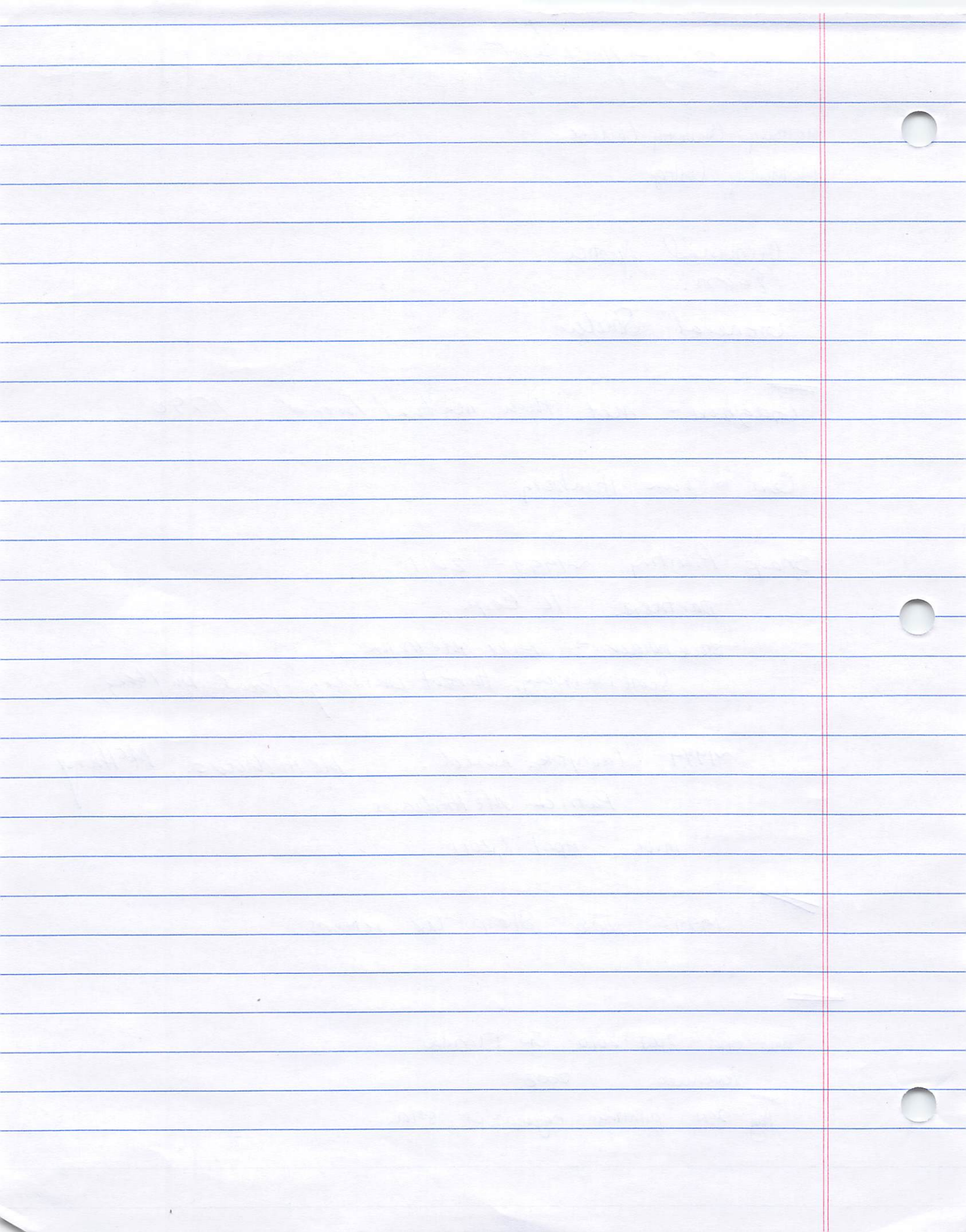
Invol. - April 8, 2011.

1999 - 2008 Sharp tax returns.

mid-end 2007-2010 @ Florida

revenue. 2008.

Aug 2011 printing equipment sold.



~~At~~

Sharp -

- No salary, no earning

2011 - nothing earned

2010 - no income

2007 - ~ 2010 - no income

2007-2010

• Juske Printing work

Print broker, Western Suburbs
early '00s -

2007-2011 a few hundred

~ 1996-2006 ^{later}

Juske - owed Sharp & Bullock &
would give product/equipment
to pay for projects.

1990 - Dinscoll criminal lawyer - Des Plaines

~~not a~~

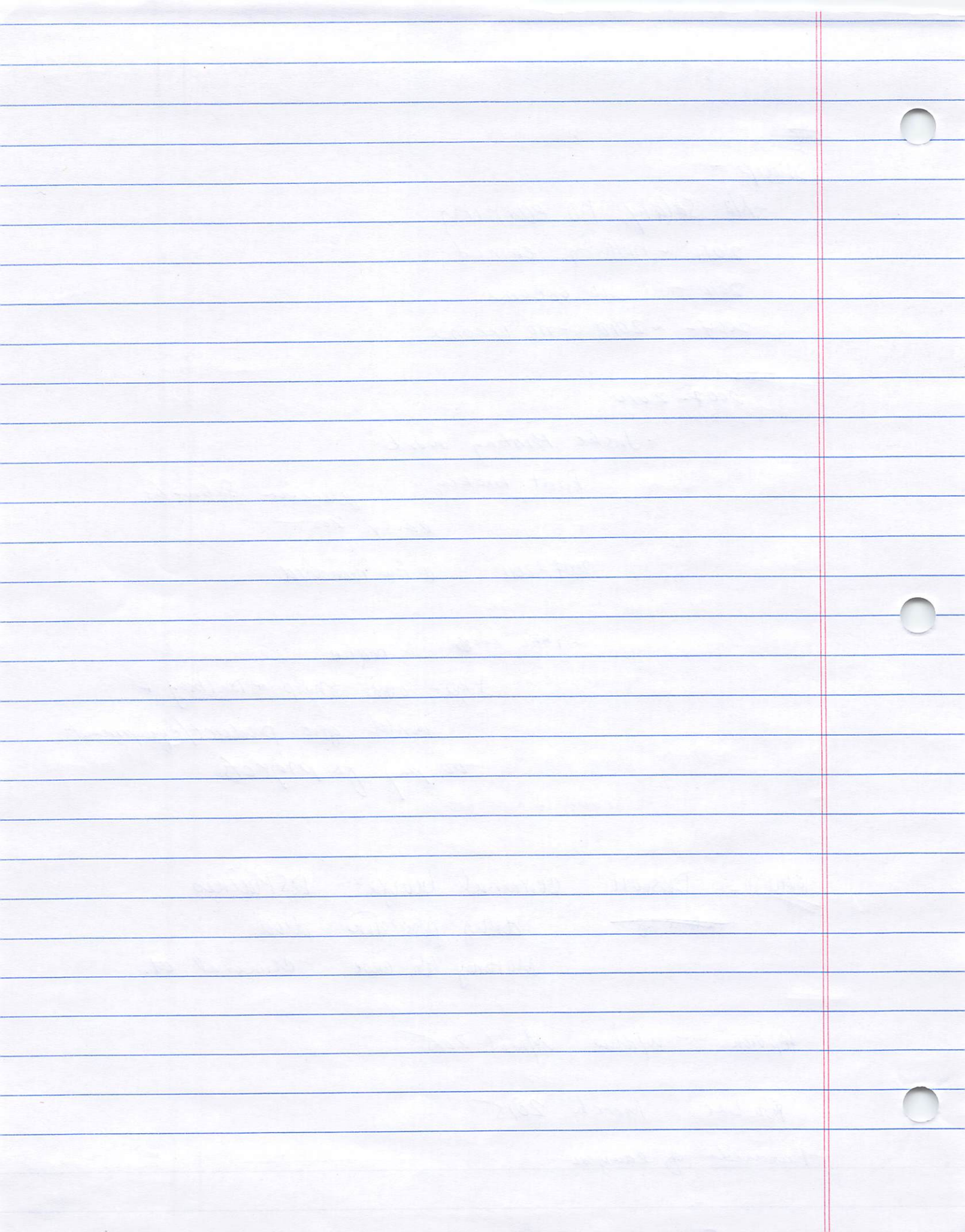
drug possession plead.

McHenry Co. case - criminal ct.

Popovich - w/draw March 2015

Bulke March 2015

- hundreds of lawyers



* letters rejecting Pl. case. —

"settlement of McGuire's"
* Sal Fains stated that the letter/phone/email.

— got that from a lot of lawyers

3 downtown firms

— Popovich / Mast.

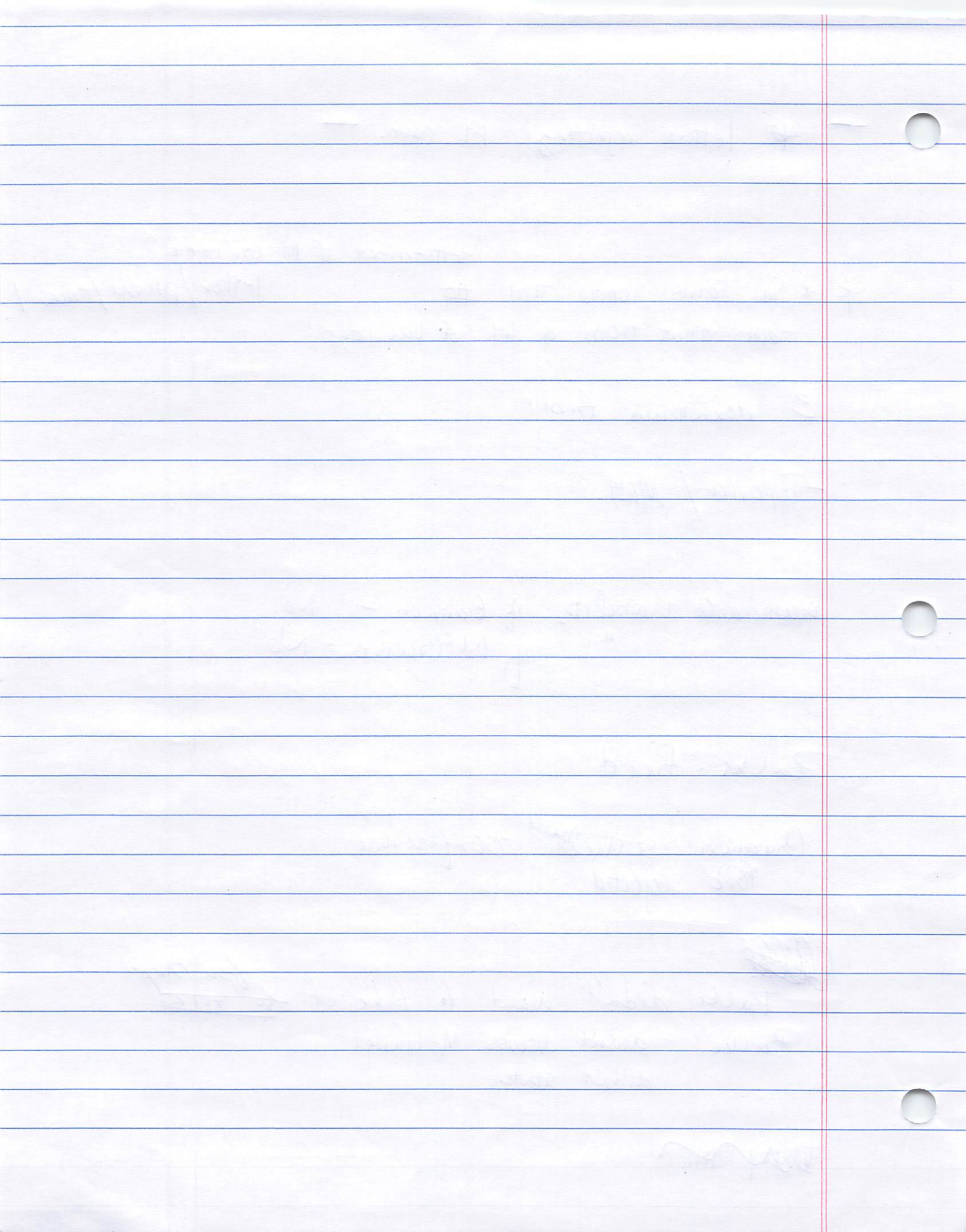
questionable liability of Gagnon — No.
" of McGuire — No.

Bulke — fired

Gagnon ^{settled} ~~settled~~ conference
\$50k rejected.

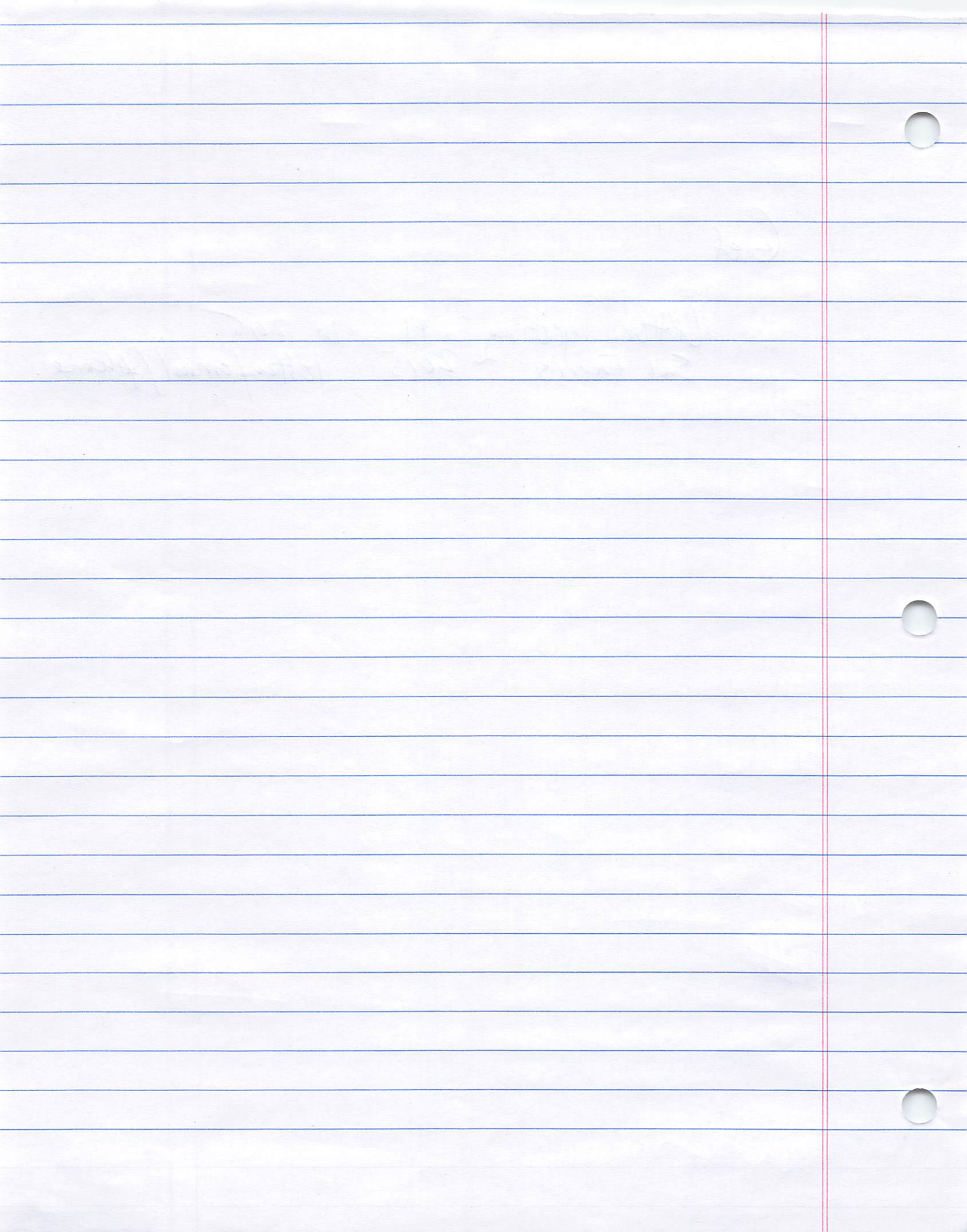
~~settled~~
Bulke didn't want to take it to trial
Bulke — didn't discuss McGuire's
didn't state.

May 1991



Gref

Letter rejecting Pl in 2015
Sal Farris ~ 2015 letter/email/phone.



Daley Disability -
SSDI

2012/2013.

- Margaret Bradshaw.
- Daley was taking over for hearing portion.

SSDI applied ~2012 OR.

✓ Margaret Bradshaw had to sign

PK.

2014.

pdenberg @comcast.net

~~denberg~~ yahoo?

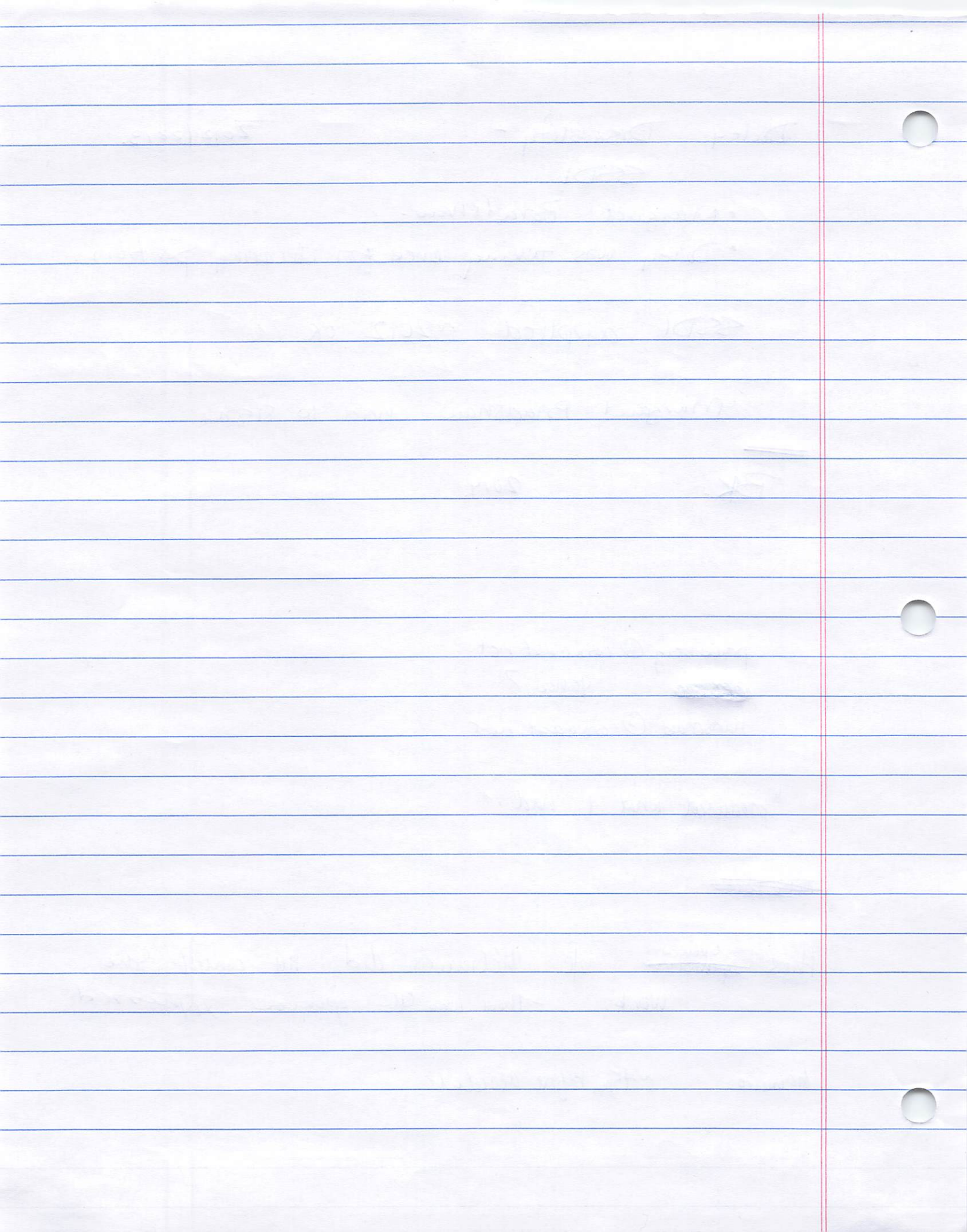
hansmast @comcast.net

"produced what I had."

~~McGuire's~~

Hans ~~opinion~~ ^{opinion} v/c McGuire's did not control the
work. - That was the opinion expressed.

McGuire ~45min before accident



ASK

*Paul's testimony is that he never gave authority to make a settlement demand.

Ask Paul if he ever gave Huns authority to make a settlement demand

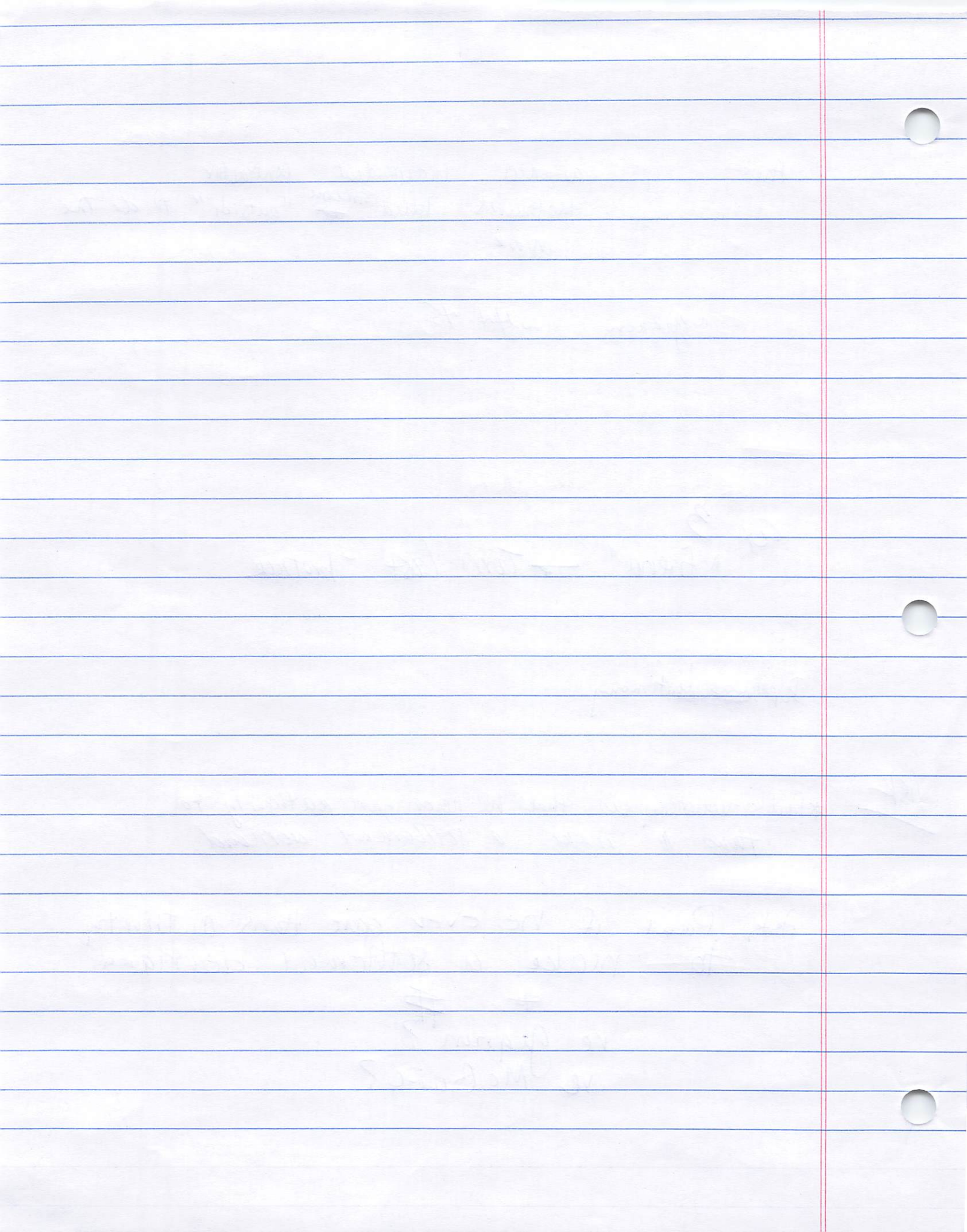
re Gagnon?
re McGuire?

Deposition testimony

Get 3 "friend" + Tom lost - broke.

Gagnon ~ 1/11-75

Huns-
affirmed independent contractor
McGuire's lived ^{status} "outside" to do the work.



Ex 5 2d Amend Complaint.

Signature —

Bates # for Signed Copy General Release.

- Dulberg testimony is that it was his decision to take the settlement.
- Port pursued.

Gagnon

\$300k.

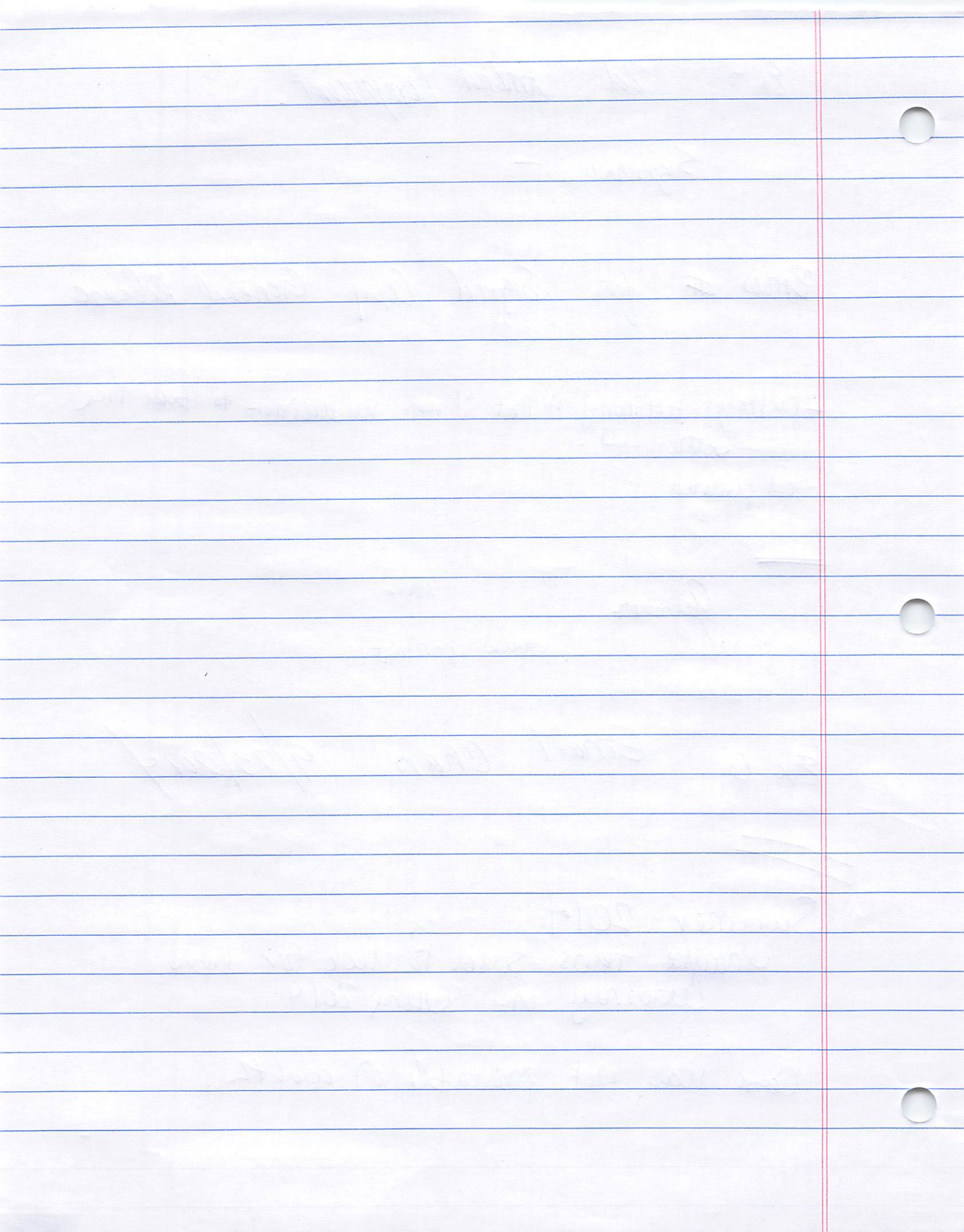
\$100k coverage.

Ex 6 Email Chain 9/23/2014

Summer 2014

maybe Huns said to look for new attorney in Spring 2014

Case was not provable or worth.



Ex 6

Dulberg

he/she said.

David + Dulberg were only witnesses.
Dulberg's version of events.

Ex 7

~~12.27~~

q. 26.2014 email.

Bottom

Dulberg 1384

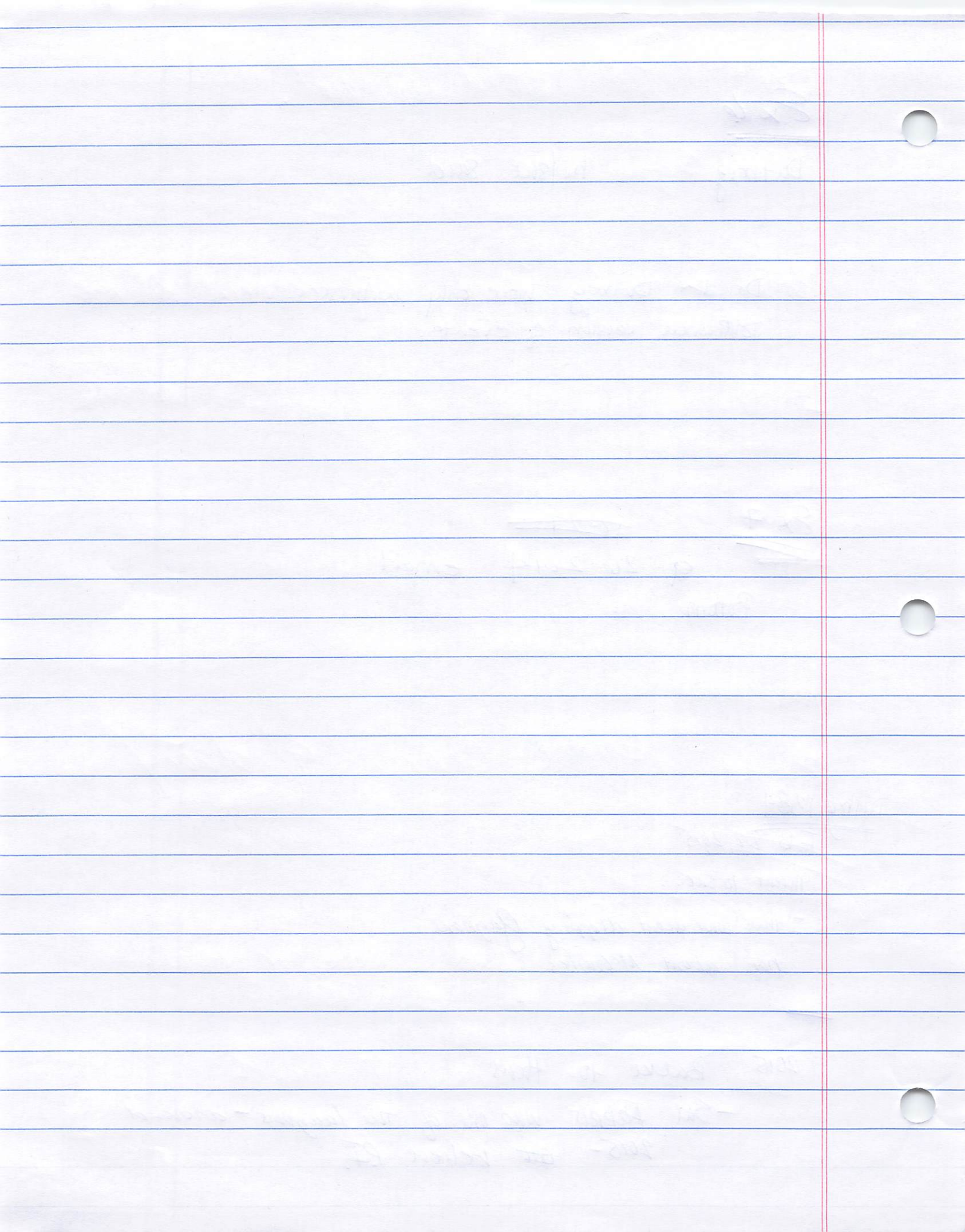
Feb 22, 2015

threat to sue.

- this was about dropping Gagnon.
not about McGuire's

2015 Balke to Hans

- Sal Farris was one of the laughers - around
2015 - ~~not~~ believe P.I.



Mediation briefs.
- Boudin's rep.

Since Dec. 8, 2010

- neurologist (R) arm.

- insured since Dec. 8, 2010.

insurance

out of pocket -

Dr. opened - Dr. Wypaer opened future medical.

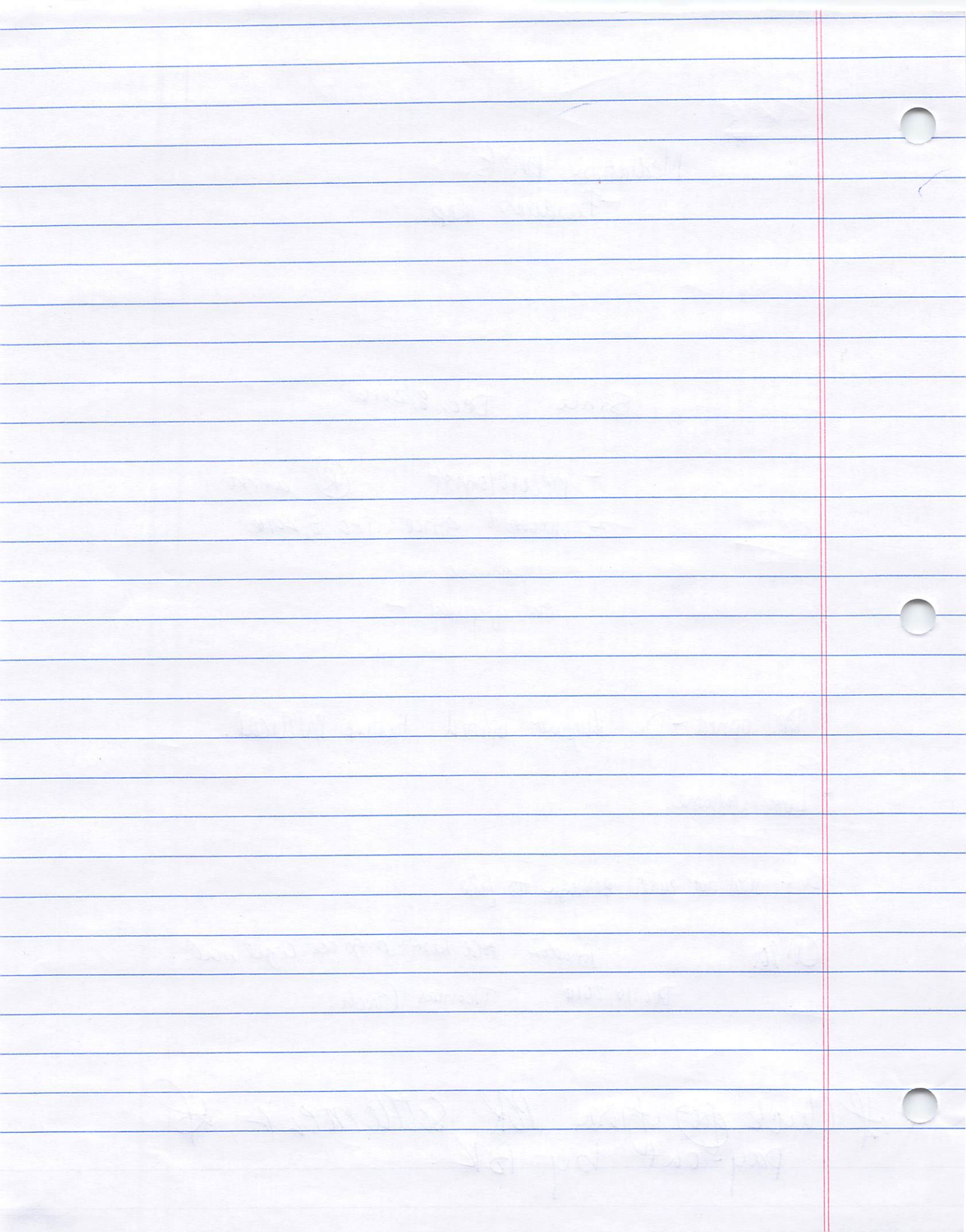
Lost income.

2015 does not earn enough to file

Q16. Boudin's told him to go see legal med.

Dec. 16, 2010 Thomas Gaochi.

\$ Check from BK settlement \$
pay-out by BK.



Ex. 12 Dulberg's Answer to As
Mast's Interrogatories.

Ex. 13 Dulberg's Answer to Repovich
RTP

① How you become aware of breach?
* Issue on our end; failed to respond.

②

Did
Good communicate in writing?

Ex

Good said "Dulberg has a valid case"
Good emails
Goodcast.

