


From: **Julia Williams** juliawilliams@clintonlaw.net 
Subject:
Date: June 26, 2020 at 9:40 AM
To: Paul Dulberg pdulberg@comcast.net



Dear Paul,

I am working to produce more documents to the other side as we indicated in your deposition and pursuant to our duty to continually update discovery. There appear to be some documents from the Gooch file that were not produced in discovery in the legal malpractice case and I want to make sure we have produced everything required to the other side. We are going to produce those now. Many appear to be duplicates.

I am continuing to work on the total supplemental production, but for now, I need your help with some files that I have attached.

1. David Gagnon Dep with Notes. Who wrote the notes on the deposition transcript?
2. Michael McArtor Dep with Notes. Who wrote the notes on the deposition transcript?
3. Paul Dulberg Dep with Notes. Who wrote the notes on the deposition transcript?
4. William McGuire Dep with Notes. Who wrote the notes on the deposition transcript?
5. Notes 1-5. Who wrote the handwritten notes from the five files of handwritten notes attached?

We appreciate your help with this.

Best Regards,

Julia Williams
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juliawilliams@clintonlaw.net

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David Gagnon
Dep wi...tes.pdf



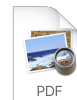
Michael McArtor
Dep Wi...tes.pdf



Paul Dulberg
Dep wi...tes.pdf



William McGuire
Dep wi...tes.pdf



Notes 2.pdf

*Dulberg,
Paul
11/11/16*

Kathy A. Kujawa, M.D., Ph.D.
Amita Health Neurosciences Institute
Eberle Medical Building
800 Biesterfield Road, Suite 610
Elk Grove Village, IL 60007
Phone: (847) 981-3630
Fax: (847) 981-3633

*② no change
to gubapentin
③ see me in
5-6 mo
K. Kujawa*

*① I have no other suggestions except
going to a big institution for
an evaluation (since I only
work at the R. H. 11)*

WORK AT LITTLE ALEXIAN WROTHEN

a) Northwestern Memorial:

DR. Cindy ZadiKoff

OR DR. Tanya Simuni

312-695-1920

b) Rush Medical Center

DR. Katie Kompoti ^{2:00 PM} ^{3:00 PM} ^{3:00 PM}

312-563-2900 DR. Cyndi Connell ^{3:00 PM} (National expert on

DR. Jennifer Goldman dystonia)

312-563-2900

c) Univ of Chicago

DR. TAO XIE 773-702-3038



Notes 4.pdf



Notes 3.pdf

GIRLFRIEND -

TRACY RUSSO

HOLLYWOOD, ALA

DAVID BEAT HER

THRU A ~~NECK~~ INTO
JOHN CHOYINSKI'S
NECK

Page 3 - Missing

