

From: **Paul Dulberg** Paul_Dulberg@comcast.net
Subject: Court Order
Date: June 5, 2020 at 9:05 AM
To: Julia Williams juliawilliams@clintonlaw.net

PD

Mr. Popovich was in Court this morning and had no problem being in a room full of people. Makes me curious if Mast shows up for his court dates but is using Covid to avoid personally attending depositions.

Here is today's court order

IN THE CIRCUIT COURT OF THE 22ND JUDICIAL CIRCUIT
STATE OF FLORIDA)
COUNTY OF HIGHLAND)

GEN. NO. 17-18-327
Jury ☒ Verdict ☐

Plaintiff: Dulberg
Defendant: Popovich

VE

Plaintiff's Attorney: Julia Williams
Defendant's Attorney: Gregory Ryan


Case No. 17-18-327
FILED: JUN 5 2020
CLERK OF COURT

ORDER

This matter coming to the Court for status, is ordered:

1) Matter is set for status on 9(1) depositions on September 10, 2020 at 9:00 a.m.

Prepared by: Gregory Ryan
Attorney for: Popovich
Attorney Registration No.: 0233331

From: Julia Williams juliawilliams@clintonlaw.net 
Subject: Re: Court Order
Date: June 5, 2020 at 9:07 AM
To: Paul Dulberg Paul_Dulberg@comcast.net
Cc: ed@clintonlaw.net, marywinch@clintonlaw.net



Dear Paul,

Thank you for the order.

It was our decision to conduct a remote deposition, not Mr. Mast. We are not conducting any in-person depositions due to the risk our staff and attorneys. We have people in our office/their family in high risk groups. I am simply unwilling to expose them any more than necessary.

Best Regards,

Julia Williams
Of Counsel
The Clinton Law Firm
111 W. Washington, Ste. 1437
Chicago, IL 60602
P: 312.357.1515
F: 312.201.0737
juliawilliams@clintonlaw.net


This message may be privileged and confidential. If you are not the intended recipient, please delete the email and notify the sender immediately.

On Jun 5, 2020, at 9:04 AM, Paul Dulberg <Paul_Dulberg@comcast.net> wrote:

Mr. Popovich was in Court this morning and had no problem being in a room full of people. Makes me curious if Mast shows up for his court dates but is using Covid to avoid personally attending depositions.

Here is today's court order

<IMG_0171.jpg>

From: Julia Williams juliawilliams@clintonlaw.net 
Subject: Fwd: Court Order
Date: June 5, 2020 at 9:08 AM
To: marywinch@clintonlaw.net, ed@clintonlaw.net



Court order in Dulberg

Julia Williams
Of Counsel
The Clinton Law Firm
111 W. Washington, Ste. 1437
Chicago, IL 60602
P: 312.357.1515
F: 312.201.0737
juliawilliams@clintonlaw.net

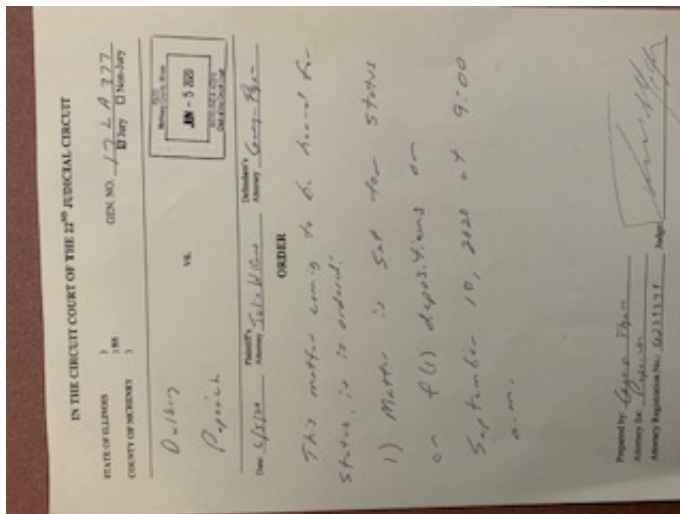
This message may be privileged and confidential. If you are not the intended recipient, please delete the email and notify the sender immediately.


Begin forwarded message:

From: Paul Dulberg <paul_dulberg@comcast.net>
Subject: Court Order
Date: June 5, 2020 at 9:04:49 AM CDT
To: Julia Williams <juliawilliams@clintonlaw.net>

Mr. Popovich was in Court this morning and had no problem being in a room full of people. Makes me curious if Mast shows up for his court dates but is using Covid to avoid personally attending depositions.

Here is today's court order



From: Paul Dulberg Paul_Dulberg@comcast.net 
Subject: Re: Court Order
Date: June 5, 2020 at 9:49 AM
To: Julia Williams juliawilliams@clintonlaw.net
Cc: Ed Clinton ed@clintonlaw.net, Mary Winch marywinch@clintonlaw.net

PD

I completely understand. I take care of my 82 yr old mom and won't be able to see her for 2 weeks because I went to court this morning.
Thank you for clarifying this.

On Jun 5, 2020, at 9:08 AM, Julia Williams <juliawilliams@clintonlaw.net> wrote:

Dear Paul,

Thank you for the order.

It was our decision to conduct a remote deposition, not Mr. Mast. We are not conducting any in-person depositions due to the risk our staff and attorneys. We have people in our office/their family in high risk groups. I am simply unwilling to expose them any more than necessary.

Best Regards,

Julia Williams
Of Counsel
The Clinton Law Firm
111 W. Washington, Ste. 1437
Chicago, IL 60602
P:312.357.1515
F: 312.201.0737
juliawilliams@clintonlaw.net


This message may be privileged and confidential. If you are not the intended recipient, please delete the email and notify the sender immediately.

On Jun 5, 2020, at 9:04 AM, Paul Dulberg <Paul_Dulberg@comcast.net> wrote:

Mr. Popovich was in Court this morning and had no problem being in a room full of people. Makes me curious if Mast shows up for his court dates but is using Covid to avoid personally attending depositions.

Here is today's court order

<IMG_0171.jpg>

From: Paul Dulberg Paul_Dulberg@comcast.net 
Subject: Re: Court Order
Date: June 5, 2020 at 12:53 PM
To: The Clinton Law Firm juliawilliams@clintonlaw.net
Cc: Ed Clinton ed@clintonlaw.net, Mary Winch marywinch@clintonlaw.net

PD

Hi Julia,

Now that I understand why we are doing a remote deposition I'm still concerned about coaching.

Since dealing with Covid is new to all of us I don't know that there is a set of standard procedures to guide us.

I have a few ideas and would be open to suggestions

1. Perhaps we can place the stenographer in the room with Mast and Flynn to ensure our rights are not violated? Of course the stenographer would have to accept the responsibilities we would normally do ourselves.

2. Perhaps we could hire a neutral 3rd party to sit in the room?

3. Perhaps the court could appoint someone to sit in the room?

I'm shooting off the hip here and would like some input as to how best to ensure that Mast is not coached by either his attorney or anyone else and that all electronic devices are shut off and no hand gestures are used.

Also, I believe it would be best if Mast was not at his own office nor his attorney's office for the deposition.

Thank You and Stay Safe,
Paul

On Jun 5, 2020, at 9:48 AM, Paul Dulberg <Paul_Dulberg@comcast.net> wrote:

I completely understand. I take care of my 82 yr old mom and won't be able to see her for 2 weeks because I went to court this morning.
Thank you for clarifying this.

On Jun 5, 2020, at 9:08 AM, Julia Williams <juliawilliams@clintonlaw.net> wrote:

Dear Paul,

Thank you for the order.

It was our decision to conduct a remote deposition, not Mr. Mast. We are not conducting any in-person depositions due to the risk our staff and attorneys. We have people in our office/their family in high risk groups. I am simply unwilling to expose them any more than necessary.

Best Regards,

Julia Williams
Of Counsel
The Clinton Law Firm
111 W. Washington, Ste. 1437
Chicago, IL 60602
P: 312.357.1515
F: 312.201.0737
juliawilliams@clintonlaw.net


This message may be privileged and confidential. If you are not the intended recipient, please delete the email and notify the sender immediately.

On Jun 5, 2020, at 9:04 AM, Paul Dulberg <Paul_Dulberg@comcast.net> wrote:

Mr. Popovich was in Court this morning and had no problem being in a room full of people. Makes me curious if Mast shows up for his court dates but is using Covid to avoid personally attending depositions.

Here is today's court order

<IMG_0171.jpg>

From: Julia Williams juliawilliams@clintonlaw.net 
Subject: Fwd: Court Order
Date: June 5, 2020 at 12:54 PM
To: ed@clintonlaw.net



Thoughts?

Julia Williams
Of Counsel
The Clinton Law Firm
111 W. Washington, Ste. 1437
Chicago, IL 60602
P: 312.357.1515
F: 312.201.0737
juliawilliams@clintonlaw.net

This message may be privileged and confidential. If you are not the intended recipient, please delete the email and notify the sender immediately.

Begin forwarded message:

From: Paul Dulberg <Paul_Dulberg@comcast.net>
Subject: Re: Court Order
Date: June 5, 2020 at 12:53:37 PM CDT
To: The Clinton Law Firm <juliawilliams@clintonlaw.net>
Cc: Ed Clinton <ed@clintonlaw.net>, Mary Winch <marywinch@clintonlaw.net>

Hi Julia,

Now that I understand why we are doing a remote deposition I'm still concerned about coaching.

Since dealing with Covid is new to all of us I don't know that there is a set of standard procedures to guide us.

I have a few ideas and would be open to suggestions

1. Perhaps we can place the stenographer in the room with Mast and Flynn to ensure our rights are not violated? Of course the stenographer would have to accept the responsibilities we would normally do ourselves.
2. Perhaps we could hire a neutral 3rd party to sit in the room?
3. Perhaps the court could appoint someone to sit in the room?

I'm shooting off the hip here and would like some input as to how best to ensure that Mast is not coached by either his attorney or anyone else and that all electronic devices are shut off and no hand gestures are used.

Also, I believe it would be best if Mast was not at his own office nor his attorney's office for the deposition.

Thank You and Stay Safe,
Paul

On Jun 5, 2020, at 9:48 AM, Paul Dulberg <Paul_Dulberg@comcast.net> wrote:

I completely understand. I take care of my 82 yr old mom and won't be able to see her for 2 weeks because I went to court this morning.
Thank you for clarifying this.

On Jun 5, 2020, at 9:08 AM, Julia Williams <juliawilliams@clintonlaw.net> wrote:

Dear Paul,

Thank you for the order.

It was our decision to conduct a remote deposition, not Mr. Mast. We are not conducting any in-person depositions due to the risk our staff and attorneys. We have people in our office/their family in high risk groups. I am simply unwilling to expose them any more than necessary.

Best Regards,

Julia Williams
Of Counsel
The Clinton Law Firm
111 W. Washington, Ste. 1437
Chicago, IL 60602
P: 312.357.1515

T: 314.357.1515
F: 312.201.0737
juliawilliams@clintonlaw.net


This message may be privileged and confidential. If you are not the intended recipient, please delete the email and notify the sender immediately.

On Jun 5, 2020, at 9:04 AM, Paul Dulberg <Paul_Dulberg@comcast.net> wrote:

Mr. Popovich was in Court this morning and had no problem being in a room full of people. Makes me curious if Mast shows up for his court dates but is using Covid to avoid personally attending depositions.

Here is today's court order

<IMG_0171.jpg>

From: Paul Dulberg Paul_Dulberg@comcast.net 
Subject: Re: Court Order
Date: June 5, 2020 at 12:58 PM
To: The Clinton Law Firm juliawilliams@clintonlaw.net
Cc: Ed Clinton ed@clintonlaw.net, Mary Winch marywinch@clintonlaw.net

PD

Better yet, I could sit in the room

On Jun 5, 2020, at 12:53 PM, Paul Dulberg <Paul_Dulberg@comcast.net> wrote:

Hi Julia,

Now that I understand why we are doing a remote deposition I'm still concerned about coaching.

Since dealing with Covid is new to all of us I don't know that there is a set of standard procedures to guide us.

I have a few ideas and would be open to suggestions

1. Perhaps we can place the stenographer in the room with Mast and Flynn to ensure our rights are not violated? Of course the stenographer would have to accept the responsibilities we would normally do ourselves.

2. Perhaps we could hire a neutral 3rd party to sit in the room?

3. Perhaps the court could appoint someone to sit in the room?

I'm shooting off the hip here and would like some input as to how best to ensure that Mast is not coached by either his attorney or anyone else and that all electronic devices are shut off and no hand gestures are used.

Also, I believe it would be best if Mast was not at his own office nor his attorney's office for the deposition.

Thank You and Stay Safe,
Paul

On Jun 5, 2020, at 9:48 AM, Paul Dulberg <Paul_Dulberg@comcast.net> wrote:

I completely understand. I take care of my 82 yr old mom and won't be able to see her for 2 weeks because I went to court this morning.

Thank you for clarifying this.

On Jun 5, 2020, at 9:08 AM, Julia Williams <juliawilliams@clintonlaw.net> wrote:

Dear Paul,

Thank you for the order.

It was our decision to conduct a remote deposition, not Mr. Mast. We are not conducting any in-person depositions due to the risk our staff and attorneys. We have people in our office/their family in high risk groups. I am simply unwilling to expose them any more than necessary.

Best Regards,

Julia Williams
Of Counsel
The Clinton Law Firm
111 W. Washington, Ste. 1437
Chicago, IL 60602
P: 312.357.1515
F: 312.201.0737
juliawilliams@clintonlaw.net

This message may be privileged and confidential. If you are not the intended recipient, please delete the email and notify the sender immediately.

On Jun 5, 2020, at 9:04 AM, Paul Dulberg <Paul_Dulberg@comcast.net> wrote:

Mr. Popovich was in Court this morning and had no problem being in a room full of people. Makes me curious if Mast shows up for his court dates but is using Covid to avoid personally attending depositions.

Here is today's court order

||| <IMG_0171.jpg>