

DULBERG'S ANSWERS TO DEFENDANTS THE LAW OFFICES OF THOMAS J.
POPOVICH, P.C.'S (expert) INTERROGATORIES TO PLAINTIFF PAUL DULBERG

Notes to Julia:

A. INTERROGATORIES TO Should Read INTERROGATORIES TO

INTERROGATORIES

1. State the name, address, telephone number and occupation of each person you will call as a witness at the time of trial of this cause and identify each witness as: (1) a lay witness; (2) an independent expert witness; or (3) a controlled expert witness.

ANSWER:

A. Lay Witnesses

(4) Thomas Kost

423 Dempster Ave., Mt Prospect, IL 60056. Electrician

Thomas Kost is expected to testify as to the legal advice given to Dulberg from Mast and The Popovich Firm on the McGuires' liability, or lack of it, and how the judge would rule when the McGuires moved for Summary Judgment against Dulberg in the December 2013 meeting. Kost is also expected to testify as to Mast expressing urgency in accepting the McGuires' offer.

Notes to Julia:

A. December should be November

(6) Caroline McGuire. Investigation Continues.

Caroline McGuire is expected to testify as to the facts and circumstances of the accident and consistent with his testimony in the case 2012 LA 178.

Notes to Julia:

A. his should read her

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A. Shouldn't Scott Dulberg and Michael McArtor be added to the list as lay witness here?