

# 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

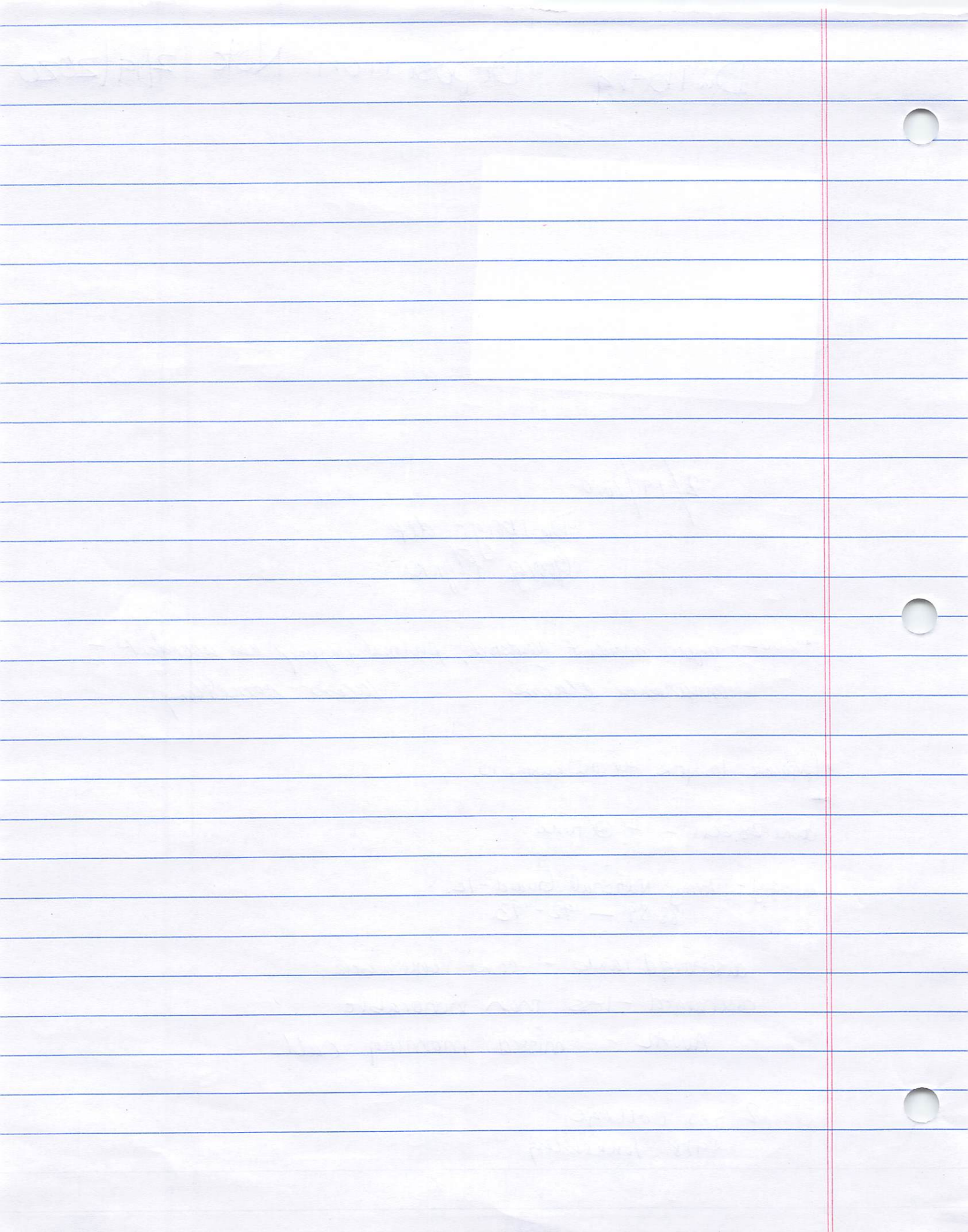
discharged rank - can't remember.

discharged - less than honorable

AWAL - missed morning call.

2 yrs college

1988 Jonesburg



# 2011 - Accident

McHenry County College.

McHenry College

Criminal Justice  
Econ.

General Studies.

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Gagnon - met thru mutual friend 1990

Cert to run Hinberg

Sharp Printing ~1999 - 2011

partner. IL Corp.

stockholder - Mike Methner.

Scott Dulberg, Hubert Dulberg, Paul Dulberg,

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

Invol. - April 8, 2011.

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1999 - 2008 Sharp tax returns.

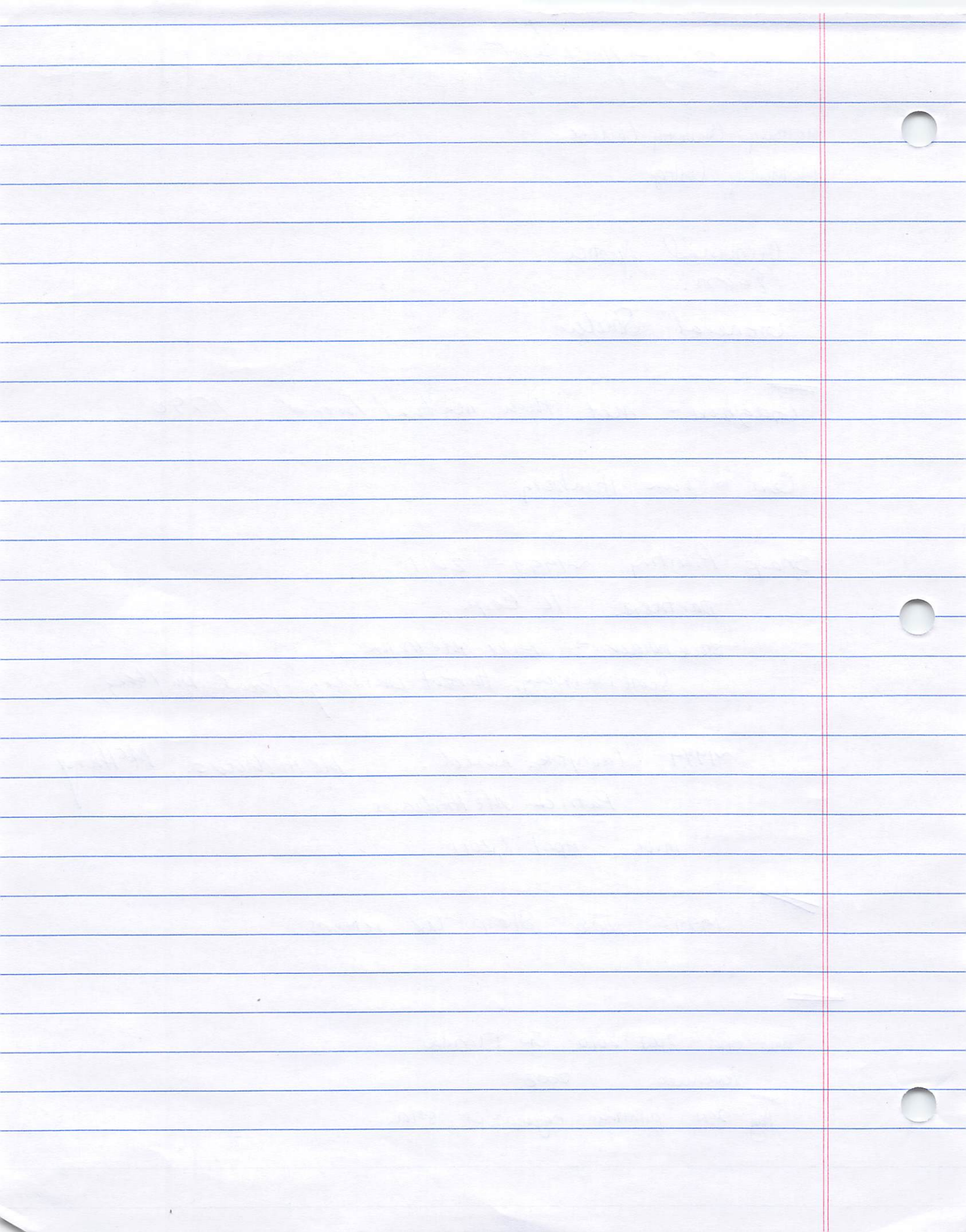
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mid-end 2007 - 2010 in Florida

revenues. 2008.

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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

partner

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

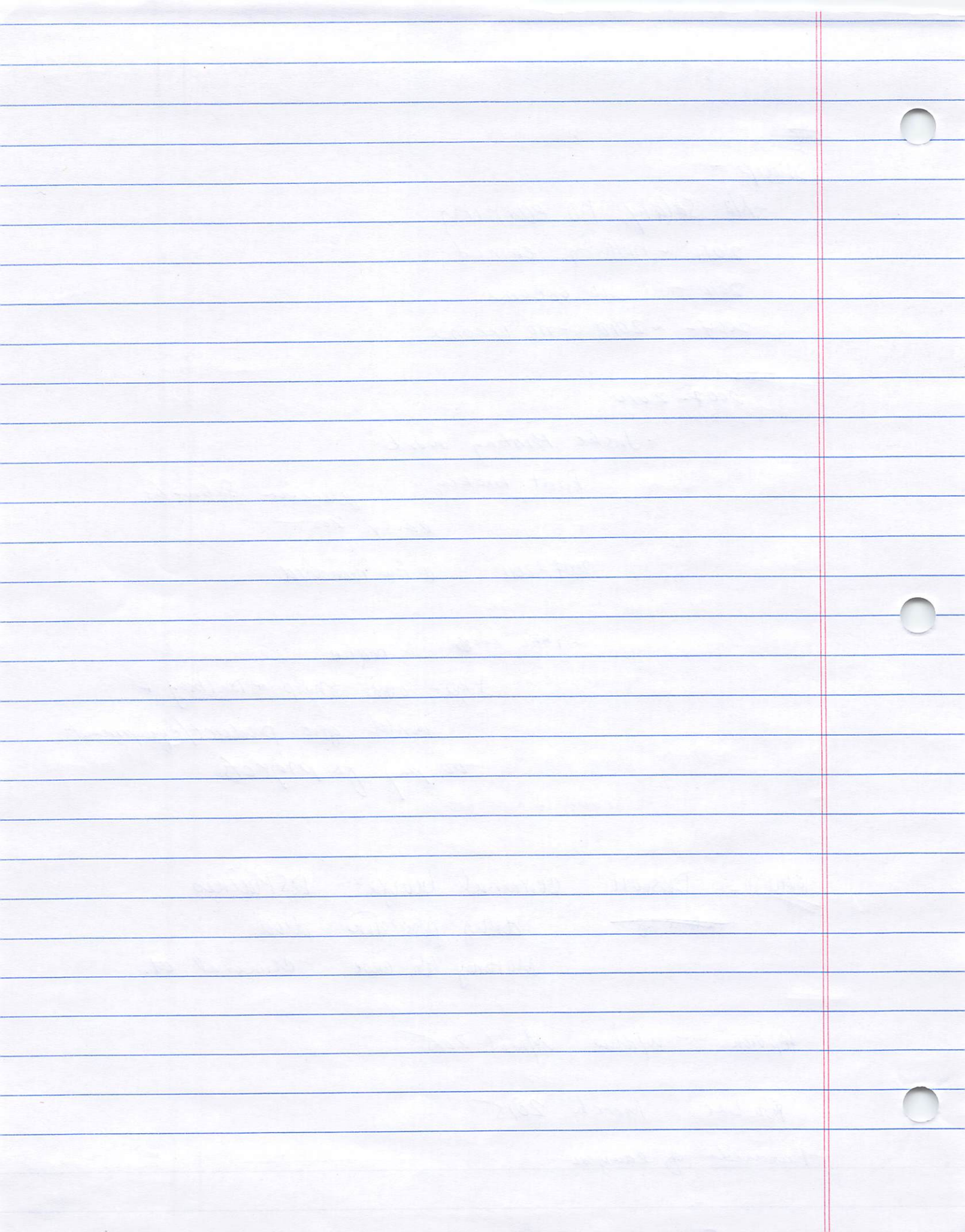
- w/draw

March 2015

Bulke

March 2015

- hundreds of lawyers



— \* letters rejecting Pl. case. —

\* \* Sal Farris stated that <sup>"settlement of McGuire's"</sup> ~~the~~ letter/phone/email.  
- got that from a lot of lawyers

3 downtown firms

- Popovich / Mast.

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

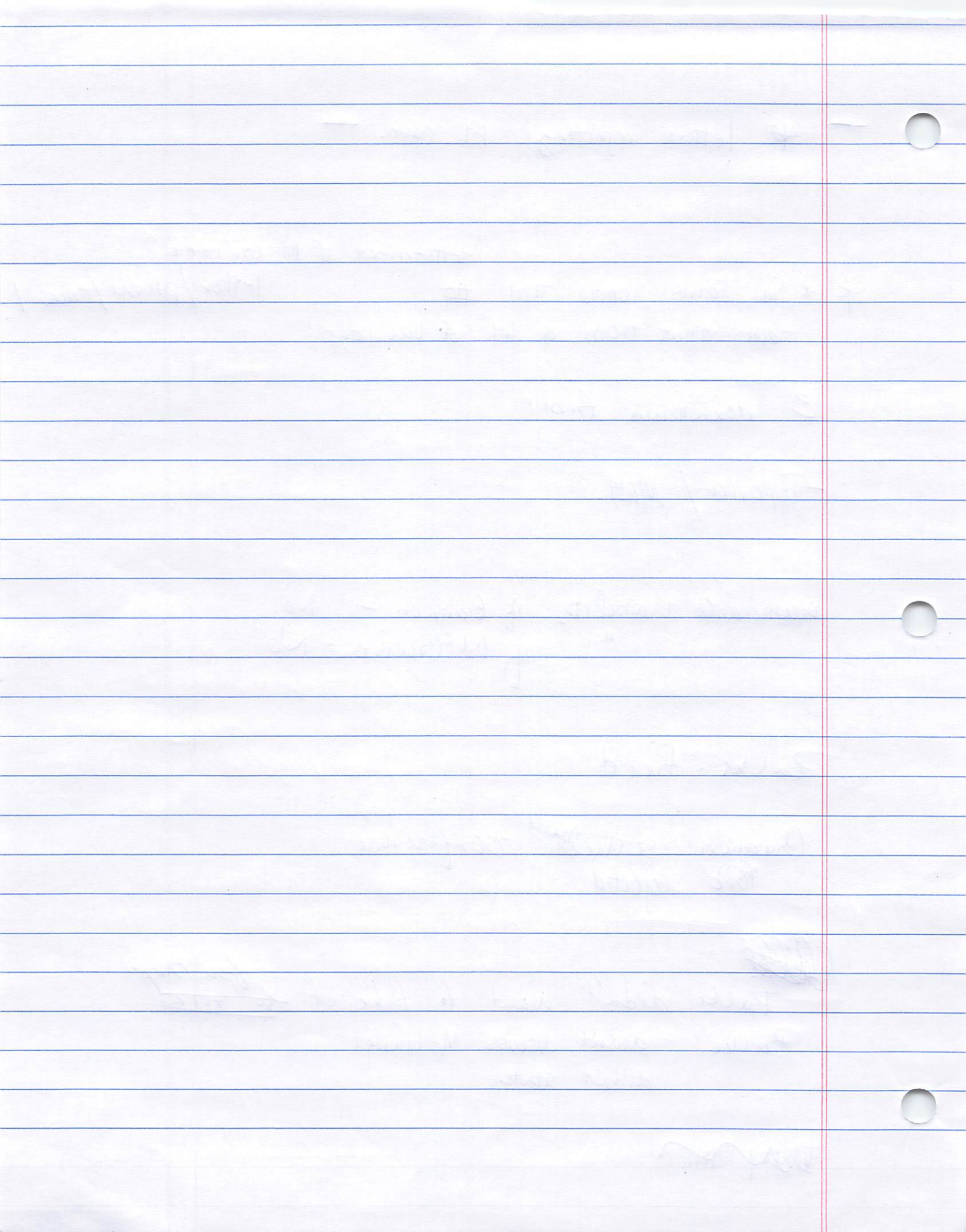
Bulke - fired

Gagnon <sup>met</sup> settlement conference  
\$50k rejected.

~~Butke~~

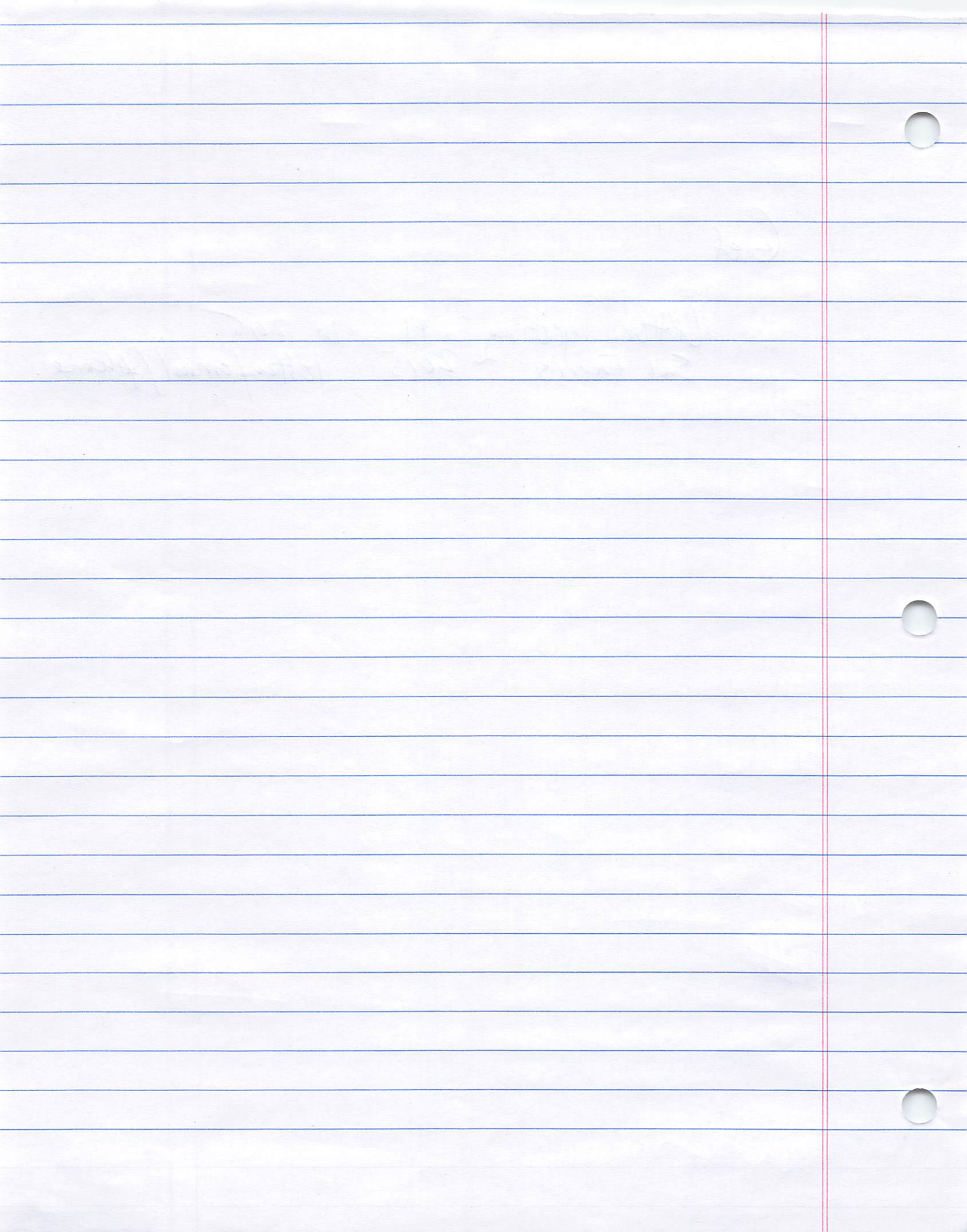
Butke didn't want to take it <sup>further</sup> ~~to trial~~.  
Butke. - didn't discuss McGuire's  
didn't state.

~~Butke~~



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?

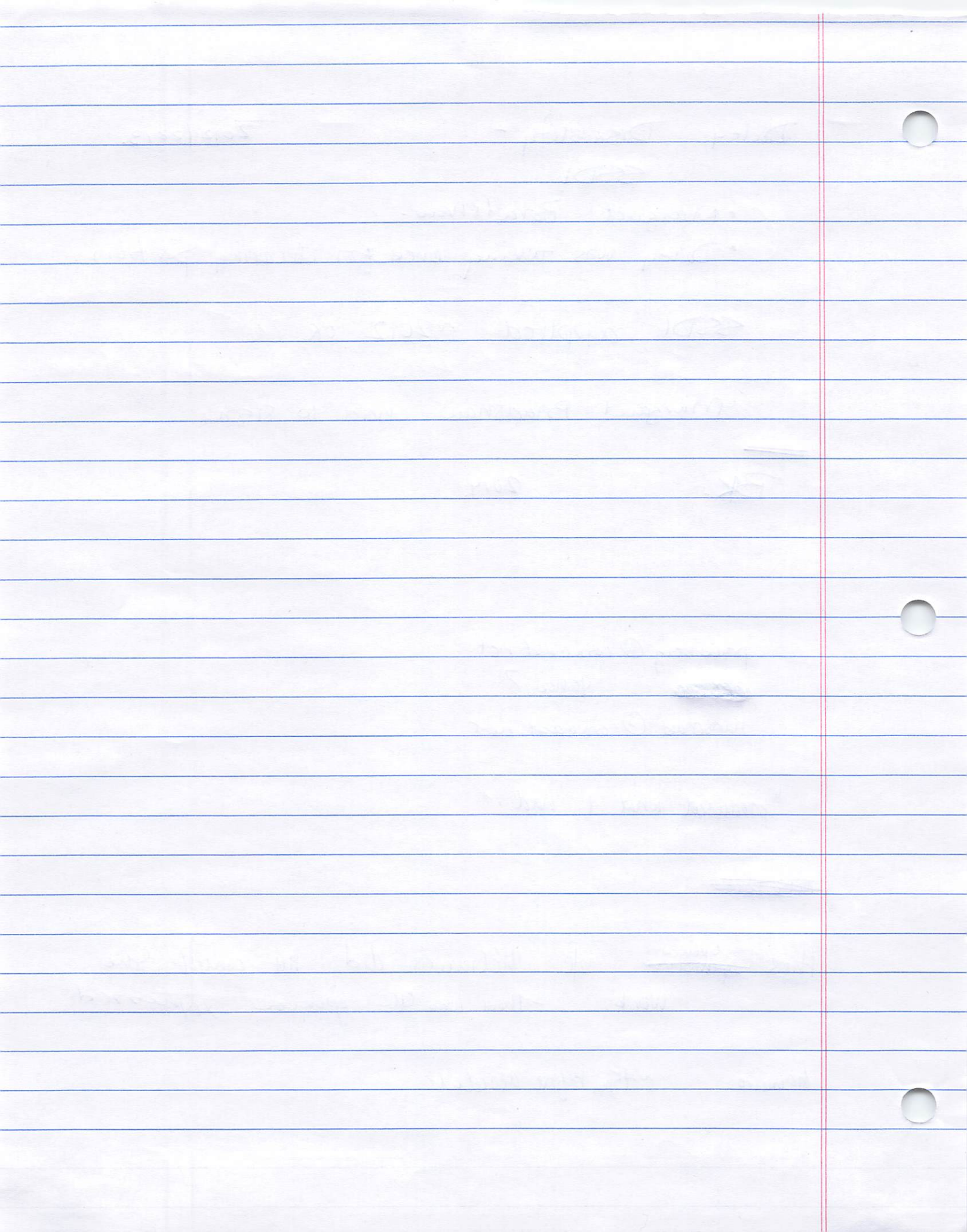
hansmast @comcast.net

"produced what I had."

~~McGuire's~~

Hans ~~opinion~~ <sup>opinion</sup> v/c McGuire's did not control the  
work. - That was the opinion expressed.

McGuire ~45min before accident



Hans-

defined independent contractor  
McGuire's hired <sup>someone</sup> ~~an~~ "outside" to do the  
work.

"Gagnon" ~ 44-45

Get 3

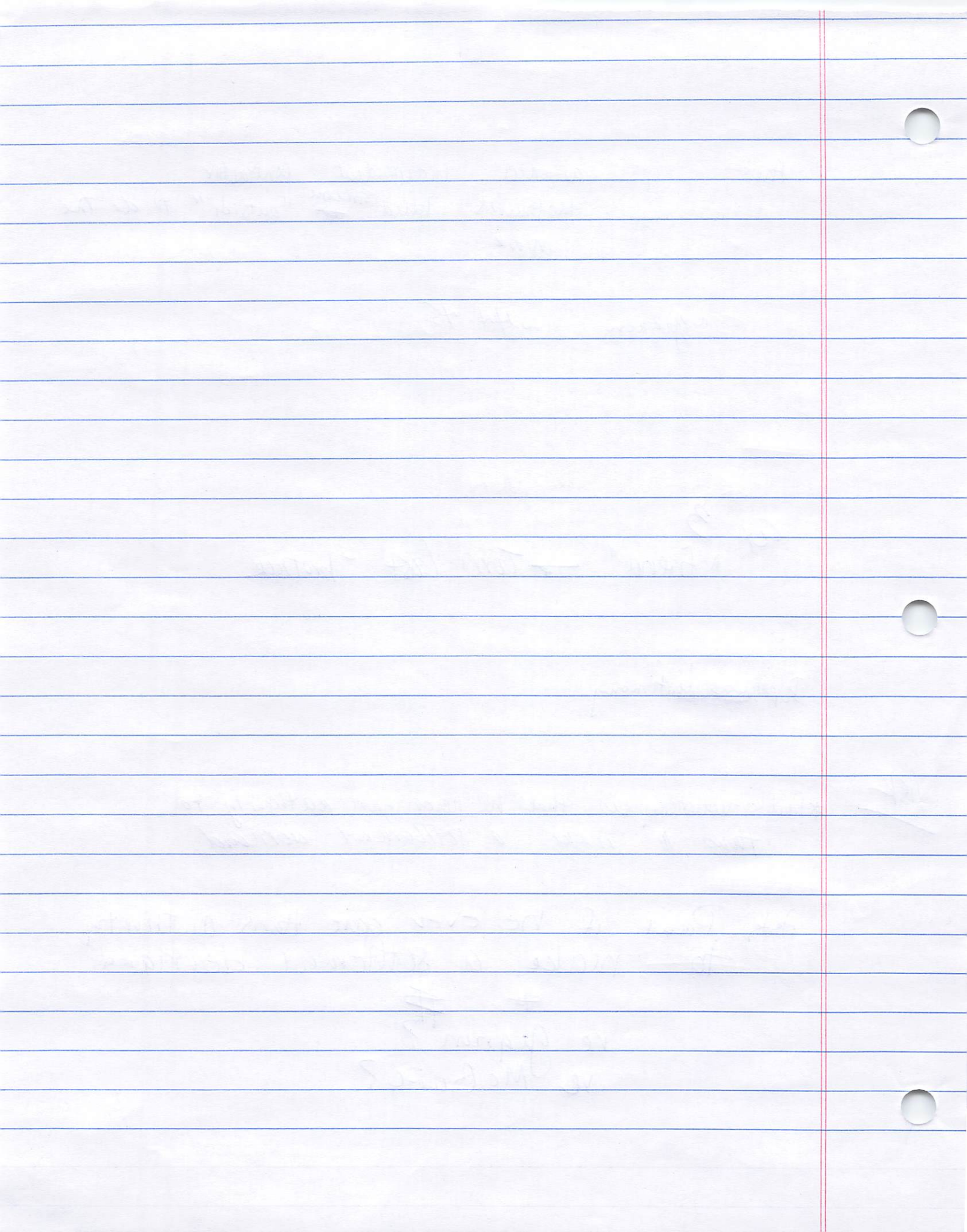
"friend" → Tom Cost - brother.

Dependent testimony

ASK

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

Ask Paul if he ever gave Hans authority  
to make a settlement demand  
to #  
re Gagnon?  
re McGuire?



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.

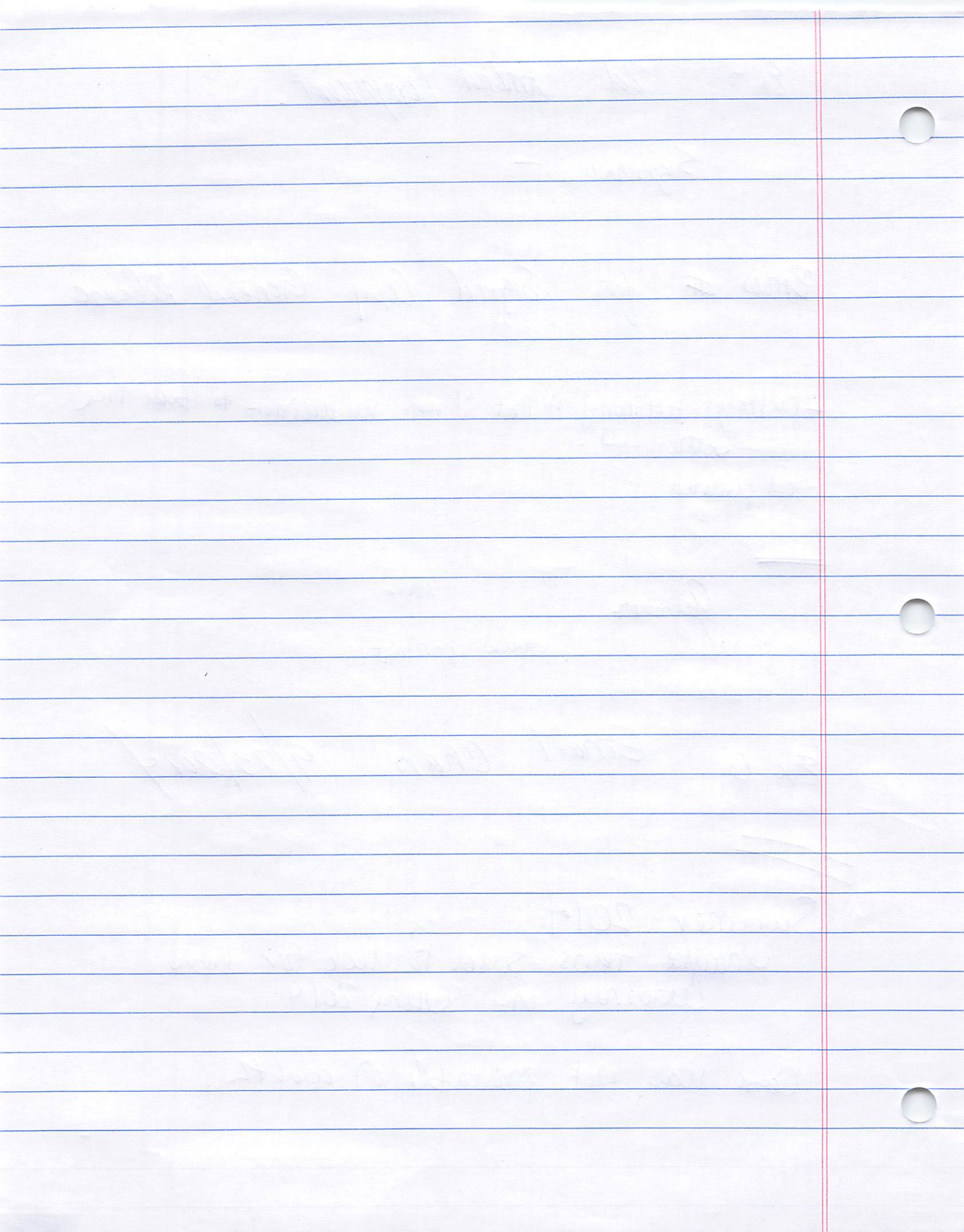
\$100k coverage.

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

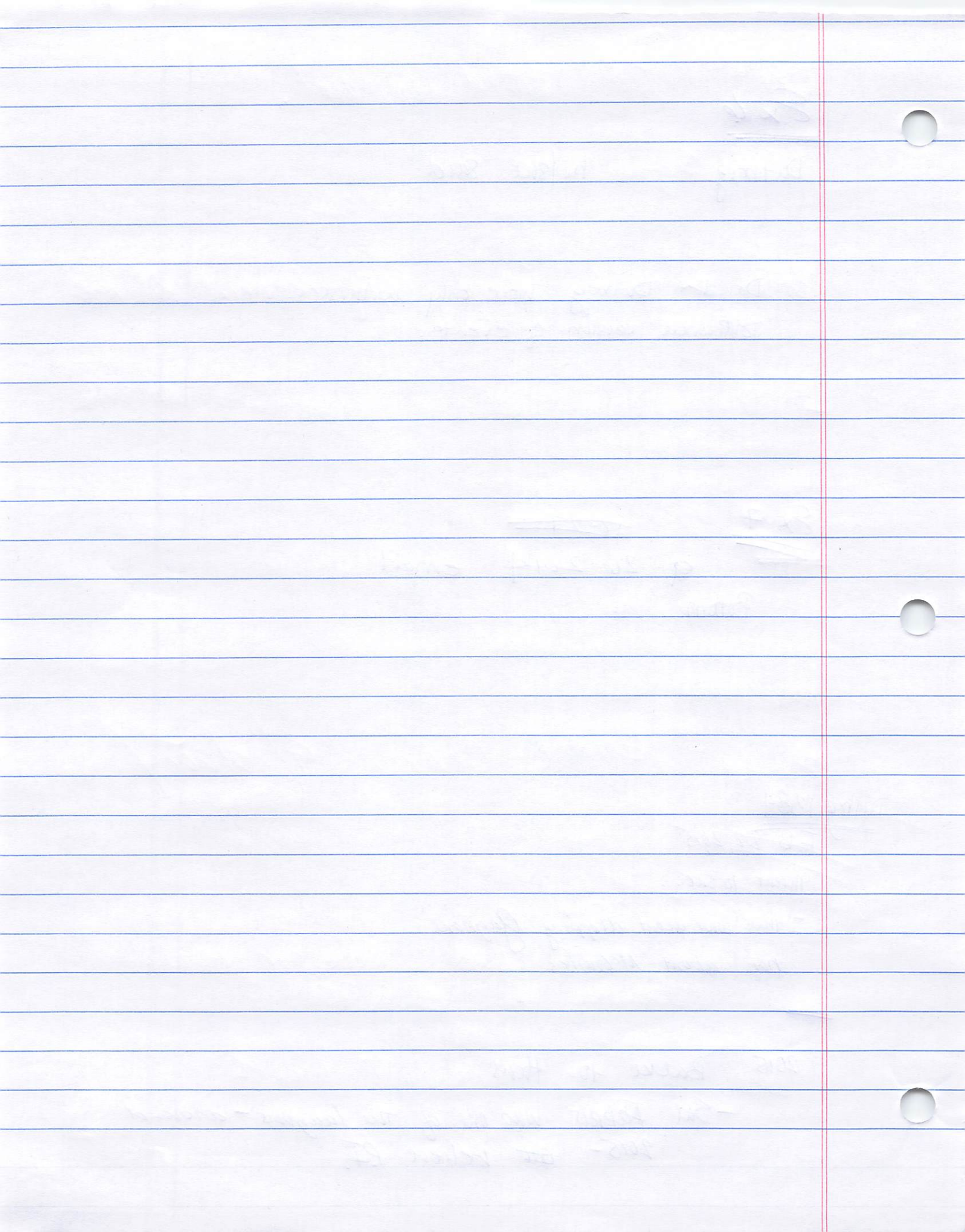
Feb 22, 2015

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.

- Baudin's Rep.

Since Dec. 8, 2016

- neurologist (R) arm.

- incurred since Dec. 8, 2016.

insurance

out of pocket -

Dr. opined - Dr. Vijayar opined future medical.

\* Lost income.

2015 does not earn enough to file

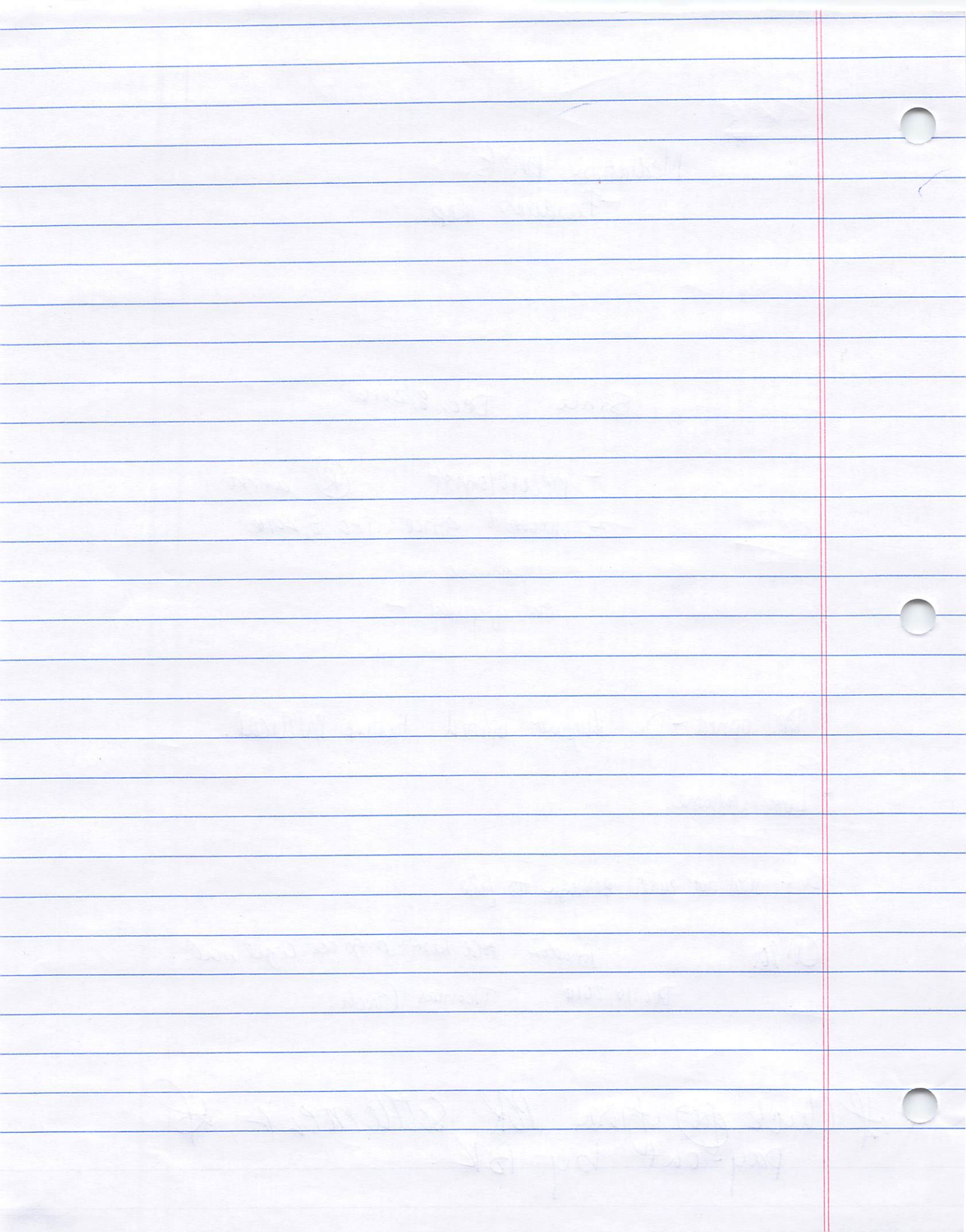
Ch 16.

Baudin told him to go see legal mal.

Dec. 16, 2016

Thomas Gooch.

\* Check ~~for~~ from BK settlement \*  
pay-out by BK.



Ex. 12

Dulberg's Answer to As  
Mast's Interrogatories.

Ex. 13

Dulberg. Answer to Popovich  
RTP

① how you become aware of breach?  
\*I saw on our end; failed to respond.

②.

Did  
Gooch communicate in writing?

Ex

Gooch said "Dulberg has a valid case"

Gooch emails  
Comcast.

