Dulberg JCW Discovery Notes:

Issued:

1. Interrogatories from Popovich
   1. Answered Sept 4 2019
   2. Supplemented Nov 26 2019
   3. Need to work on 26 & 27 to supplement; Issue, opened the door from Gooch in the deposition. But need to check on waiver issue—how much did Paul waive by stating that Gooch was the one that told him he had a legal malpractice case and he could not have known until he had counsel.
2. Interrogatories from Mast Sept 4 2019
3. Interrogatories from Popovich 213(f)s Sept 4 2019
4. RTP—there are no questions that go to the discovery issue; they were all about communication in the underlying case which is being produced.
5. RTP—Withdraw objection for RTP 4&5; Deal with 8 as it addresses 26/27 or new request from George.

Interrogatories to Dulberg

Number 27. Identify expert witness in Paragraph 57 of the second amended complaint—

That was Langford. But in his Dep, Paul testifies that Gooch told him he had a case and that is really when he first learned of it.

Paul also states that several attorneys rejected his case and he had emails, notes, letter re same.

Letters rejected PI case, Saul Ferris emails etc re rejected PI case

**Documents to Be Produced.**

The documents that still need to be produced as of June 26, 2020 are contained in the folder inside the Dulberg Dropbox file titled as:

Dulberg Documents to Be Produced 2020 June 5

Each file is titled: Dulberg Supp # 2020 June 26, 2020

There are two files that Paul needs to review prior to production which are in the Gooch Files to Be Produced—(1) Client Handwritten Misc Notes and (2) Depostiions—done—they can all be produced.