56. Following the execution of the mediation agreement and the final mediation award, Dulberg realized for the first time in December of 2016 that the information Mast and Popovich had given Dulberg was false and misleading, and that in fact, the dismissal of the McGuires was a serious and substantial mistake.

57. It was not until the mediation in December 2016, based on the expert’s opinions that Dulberg retained for the mediation, that Dulberg became reasonably aware that Mast and Popovich did not properly represent him by pressuring and coercing him to accept a settlement for $5,000.00 on an “all or nothing” basis.

#26 Supplemental

In December of 2016, Dulberg received the binding mediation award. At that time, he learned that he could not collect the entirety of the award from Mr. Gagnon and it was a serious mistake to settled with the McGuires.

#27

Dr. Landford is the only person that could be the expert.