Paul Dulberg

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4606 Hayden Ct

McHenry, IL 60051

Legal Mal from Personal Injury in McHenry

In the pleading stage in McHenry for Legal Mal.

Personal Injury was done at ADR.

Neighbors asked Paul if he wanted wood. Paul did not take the wood because it was a pine tree.

Paul worked with the neighbor.

Husband and son cut down the tree.

Paul and son finished cutting down tree.

In the process, the son was never trained on chain saw.

Dominent arm cut in half.

Hospital McHenry—Integra

Seeking $1.2 million.

Found against the son for $660K---$300K from Allstate.

Then the homeowners were dismissed out before witnesses. There was a settlement with the homeowners for $5,000

Homeowners policy was never pulled. The son’s policy was $100K, but it was $300K. Dec sheet

Homeowners had insurance but we don’t know the policy and the amount.

Papavich old firm

New firm Randy Bouden and Kelly Bouden

Legal Mal—Thomas Gausch.

Papavich Firm

The homeowners own the chainsaw.

The homeowners property.

Social security determined permanent disability.

Legal Malpractice is George Flynn,

|  |
| --- |
| Clausen Miller, P.C.10 S La Salle St 16th Flr Chicago, IL 60603-1015 |
| **Registered Business Phone:** | (312) 855-1010  |

Thomas Gausch was given $15,000.

We need to look at that retainer.

Next date is Oct. 10.

The case was dismissed twice for failing to allege the facts of the underlying case.

Oct 12, 2018

Meeting with Client and Brother Tom

Last Ct order was 9.12

10.10 to file new pleading

11.13 9am

Opposing counsel is withdrawing on Monday 10.15.2018

MAST liability as a lawyer

Mast represented that the Defendant Homeowners would have won on summary judgment.

Mast represented in a meeting. Mast also represented via email.

The case was

Gooch Expenses

Initial filing fee and other copying costs

Paid $10K at the time of retainer

Paid $5K on 11/22/2017

Clausen Miller representing both of them.

Son being paid to do the work. Each of the other side parties testified to a different amount of payment.

Existing depositions are inconsistent.

20% contributory negligence.

There is a finding of 20% contributory negligence. We need to find this order.

Asked for $1.2 million

Got $660K

Randy and Kelly Baudin

Baudin told Paul there was a claim against the homeowners

There was a chainsaw liability expert from Montana

He submitted an affidavit.

He was not deposed.

Liability expert for the underlying cases.

Chainsaw expert.

No homeowners liablity expert not obtained

May not need one.

Treater’s as experts.

Treaters were deposed. Unclear whether they were evidence depositions. Likely so.

The homeowners was there and dad was working with the son.

Ed said $2500 for costs etc.

We need to work out with Gooch what his lein is.

Job before the injury:

1. Graphic designer. Intermanic 10yrs W2; 2007 or 2008 1099; Mark Last name unknown
2. PRintering Press
3. Screen printing press

1099 mostly for everyone and some work for self.

Tax returns disclosed through underlying litigation.

$80K/year

Varied from $40K/year to $60/K per year.