

*Ehrmann Gehlbach Badger Lee & Considine, LLC**215 E. First Street, Suite 100**Dixon, IL 61021**815-288-4949**Fax: 815-288-3068 E-mail: heeg@egblc.com***FAX TRANSMISSION COVER SHEET****Date:** *February 16, 2015***To:** *Hans Mast, Esq.***Fax:** *815-344-5280***Re:** *Dulberg**090129***Sender:** *Megan G. Heeg, Esq./kme*

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February 16, 2015

BY FAX

Hans A. Mast, Esq.

The Law Offices of Thomas J. Popovich P.C.

3416 W. Elm Street

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Re: Your File: Paul Dulberg v. David Gagnon, et al
My File: Bankruptcy Estate of Paul Dulberg; Case No. 14-82297

Dear Attorney Mast:

Thank you for the information you sent on January 23rd. At this point in time, I am unable to determine if my bankruptcy case may be an asset case. (If it might be an asset case, my Estate needs to retain you to continue the pending pi case -- assuming you can be and want to be retained.)

I received from you a list of medical bills (which bills total over \$58,000.) In addition, I just received from Debtor's counsel a copy of a letter from US Phy, by which this creditor claims a medical lien.

Can you please advise:

- 1) What is the total amount of medical liens filed against the pending pi case? (I received a copy of a document, listing medical bills totaling \$58,387.33, but I don't know if any of these bills are unpaid and, if so, if the unpaid providers timely filed a medical lien).
- 2) As to the medical lien apparently claimed by US Phy (via its letter of January 8, 2015 - a copy of which is attached for your ready reference) is this letter the first lien claim it made against the personal injury cause of action? If so, based upon the little research I've done, to date, I don't think this letter is sufficient to claim a lien -- post-bankruptcy filing -- on Debtor's right to recover in his pi case. (It may be that I need to file

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something in the bankruptcy case to cause this lien to be removed. Investigation continues.)

- 3) Once I know the above facts, I will need to know the potential range of recovery, and, assuming the potential recovery is large enough, if you want to be retained by the Bankruptcy Estate to continue to represent the Debtor/Estate in the pending personal injury cause of action.

I look forward to hearing from you again soon.

Very truly yours,

EHRMANN GEHLBACH BADGER LEE & CONSIDINE, LLC

Megan G. Heeg
Megan G. Heeg

MGH/kme