

4. Any and all documents regarding any damages you suffered at any time as a result of any breach of the standard of care by Popovich or Mast in their representation of you or provision of legal services to you.

RESPONSE: Objection - This places an undue burden on Plaintiff, any documents requested that are not privileged or work product of the current case, are already in defense counsels possession.

5. Any and all documents which provide or form the basis for your contention that you did not discover until December 16, 2016 that you had been injured or damaged by Mast or Popovich's negligence in representing you in the claim or lawsuit against William and Caroline McGuire.

RESPONSE: Objection - Dulberg discovered the injury on December 12, 2013, Dulberg met with an attorney for the current case on December 16th, 2016

This places an undue burden on Plaintiff, any documents requested that are not privileged or work product of the current case, are already in defense counsels possession.

6. All documents, including letters and email communications between Tom Gooch on the one hand, and you on the other hand, regarding legal advice he provided to you on December 16, 2016 and thereafter, that you "had a malpractice case" against Popovich, as testified by you at pages 129-142 of your discovery deposition from February 19, 2020.

RESPONSE: Objection - This places an undue burden on Plaintiff, all letters and emails between Tom Gooch and the Plaintiff are privileged and work product of the current case, any documents requested that are not privileged or work product of the current case, are already in defense counsels possession.

7. Any and all documents reflecting opinions by attorney Randy Baudin regarding the liability of the McGuire's, whether the advice or opinions were rendered at your mediation of the underlying case (on or about December 16, 2016) or prior thereto, as testified at your discovery deposition on February 19, 2020 (see page 141).

RESPONSE: Objection - This places an undue burden on Plaintiff, any documents requested are already in defense counsels possession.