

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Possible witness**
Date: December 28, 2016 10:32:46 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: November 20, 2013 at 10:44:36 AM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Possible witness**

Hi Hans,
Talked with the McGuire neighbor Brian Beebe

Brian Beebe
815-669-0655
1015 oak leaf ave.
McHenry, IL 60051

He remembers the day the tree work was done and said he watched for a while and talked with the people over there because they had asked him to borrow his chainsaw for the same project but doesn't remember the incident itself. He did tell me he has been used as an expert witness for chainsaw incidents because of the kind of work he does.
He did say that his "x" lived with him at the time and is going to ask her if she remembers anything at all and will get back to us. He seems very willing to help.
He has both yours and my number.
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Dave's Best and oldest friend John**
Date: December 28, 2016 10:33:35 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: November 20, 2013 at 7:26:53 AM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Dave's Best and oldest friend John**

Morning Hans,

Ok we can meet. I will call Sheila today and set up a time.

Please send me a link to the current Illinois statute citing that the property owner is not liable for work done on their property resulting in injury to a neighbor.

I need to read it myself and any links to recent case law in this area would be helpful as well.

Thanks,

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Nov 20, 2013, at 6:59 AM, Hans Mast <hansmast@comcast.net> wrote:

Paul, lets meet again to discuss. The legality of it all is that a property owner does not have legal liability for a worker (whether friend, son or otherwise) who does the work on his time, using his own independent skills. Here, I deposed the McGuires, and they had nothing to do with how Dave did the work other than to request the work to be done. They had no control on how Dave wielded the chain saw and cut you. its that simple. We don't have to accept the \$5,000, but if we do not, the McGuires will get out for FREE on a motion. So that's the situation.

----- Original Message -----

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Tue, 19 Nov 2013 02:29:56 -0000 (UTC)
Subject: **Re: Dave's Best and oldest friend John**

I still don't get how they don't feel responsible for work done on their property by their own son that ended up cutting through 40% of my arm.

Perhaps their negligence is the fact that they didn't supervise the work close enough but they did oversee much of the days activity with David. Just because Dave was doing the work doesn't mean they were not trying to tell their kid what to do. They told him plenty of times throughout the day what to do. How is that not supervising?

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On Nov 18, 2013, at 8:07 PM, Hans Mast <hansmast@comcast.net> wrote:

Paul whether you like it or not they don't have a legal liability for your injury because they were not directing the work. So if we do not accept their 5000 they will simply file a motion and get out of the case for free. That's the only other option is letting them file motion getting out of the case

Sent from my iPhone

On Nov 18, 2013, at 7:40 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

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If you want a negligence case for the homeowners ask what happened immediately after the accident.

Neither of them offered me any medical assistance nor did either of them call 911 and all Carol could think of besides calling David an idiot was calling her homeowners insurance.

They all left me out in the yard screaming for help while they were busy making sure they were covered.

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How selfish are people when they worry about if their insured over helping the person who was hurt and bleeding badly in their yard.

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Let me know what you think..

Hans

----- Original Message -----

From: Paul Dulberg <pdulberg@comcast.net>

To: Hans Mast <hansmast@comcast.net>

Sent: Fri, 15 Nov 2013 22:41:26 -0000 (UTC)

Subject: Dave's Best and oldest friend John

Hans,

Just spoke with John Choyinski again about talking with you.

I am leaving your number with him as he has agreed to talk with you about David Gagnon.

I believe he will try and call sometime tomorrow.

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Sorry for the rant but Dave was a complete ass all the way and deserves this.

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Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Conservative jury**
Date: December 28, 2016 10:34:40 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: November 19, 2013 at 1:32:42 AM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Conservative jury**

Hans,

A while back you told me that the jury's here in this county are primarily conservative and that they know the only reason we are before them is for money.

Not sure if that statement was meant to scare me or not but I do agree, they are, for the most part conservative and I would hope we should make it known we want money for damages, lawyers fees and the medical bills, etc... loud and clear.

We should also make it known to the jury that the parties or their insurance companies have never even offered to pay 1 cent for any of the medical damage and that's why we seek the juries help in settling this dispute. Perhaps if the insurance companies would have paid for these basic things none of us would even be here. but they didn't and now yes after years of waiting I am seeking money to pay for the medical treatments, you as the lawyer and finally myself as I'm the one who has had to suffer the consequences of the Gagnon/McGuire choices on that day.

I cannot believe that a conservative jury isn't going to award anything less than the cost of the medical damages and lawyer fees from them unless something catastrophic changes. I do see them being conservative as to what I will end up with at the end but not the real medical and lawyers bills. Even the conservative juries in this county are not so conservative that they won't give the base bills.

The McGuires insurance is free to go after David for damages if they lose.

Other than fearing a motion to dismiss the suit against the McGuire's insurance based on some false concept that because they didn't have their finger directly on the chainsaw trigger they hold no responsibility for damages.

what are the real benefits of letting them off so easy?

And I don't want to hear its because 2 parties vs 1 is much easier.

Letting off the McGuires insurance for such a small amount is anything but reasonable and I just can't see any ethical judge in this county not keeping them in the suit all the way for a jury to decide whether they had any part to play in the days events and the level of responsibility they share with David for the consequences considering it was the McGuires project, their land, their choice of who did the labor etc. etc...

When you advised me to seek a settlement with the McGuires insurance, I agreed to look at it only because they didn't have their hands directly on the trigger of the chainsaw and That you would get at the least the medical bills paid for out of it. I thought that was made clear in your office.

I know you work on approximately 33%. Is 33% of 5,000 even worth the time and money you already invested? It's only \$1650 for you and I'm sure your hourly fee eats that up rather quickly, I know mine did back when I had hands and arms that worked so I could charge.

Paul Dulberg
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Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Conservative jury**
Date: December 28, 2016 10:34:06 AM CST
To: paul_dulberg@comcast.net

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Paul Dulberg
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Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Dave's Best and oldest friend John**
Date: December 28, 2016 10:35:38 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: November 18, 2013 at 9:03:30 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Dave's Best and oldest friend John**

That's their personal issues of control with their own son. I will testify all day long about the things they wanted him to do that he did do throughout the day.

By claiming they had no control over the work dave did after all the preparation, money and time spent out in the yard yelling at him that they wanted certain things done in a particular way I don't see how they get out of the direct over site of the project because now that there is an injury they don't feel they had any real direct control over their own workers actions?
This is ridiculous.

Hans, they have to do better than claim they had no control over David that day. If that's the case why were they there watching the work most of the day? Even Bill had hands on doing some of the work and rarely let David go to long without checking and seeing if things were being done the way Carol and Him wanted it.

Paul Dulberg
847-497-4250
Sent from my iPad

On Nov 18, 2013, at 8:36 PM, Hans Mast <hansmast@comcast.net> wrote:

Cause they had no say on how Dave did the work. That is what the evidence from all shows.

Sent from my iPhone

On Nov 18, 2013, at 8:29 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

I still don't get how they don't feel responsible for work done on their property by their own son that ended up cutting through 40% of my arm.

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How selfish are people when they worry about if their insured over helping the person who was hurt and bleeding badly in their yard.

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To: Hans Mast <hansmast@comcast.net>

Sent: Fri, 15 Nov 2013 22:41:26 -0000 (UTC)

Subject: Dave's Best and oldest friend John

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From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Dave's Best and oldest friend John**
Date: December 28, 2016 10:36:11 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: November 18, 2013 at 8:29:56 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Dave's Best and oldest friend John**

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To: Hans Mast <hansmast@comcast.net>

Sent: Fri, 15 Nov 2013 22:41:26 -0000 (UTC)

Subject: Dave's Best and oldest friend John

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To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: November 18, 2013 at 8:19:15 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Fwd: Dave's Best and oldest friend John**

Thinking of what I just wrote,
Should we take the 5 and let them off David's suite and then charge them with the aftermath?
The same can be done with David.
He absolutely refused me a ride to the hospital in his car because I was bleeding so bad.

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

Begin forwarded message:

From: Paul Dulberg <pdulberg@comcast.net>
Date: November 18, 2013 at 7:40:23 PM CST
To: Hans Mast <hansmast@comcast.net>
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Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Mike Thomas subpoena**
Date: December 28, 2016 10:37:48 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: November 18, 2013 at 6:38:15 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Mike Thomas subpoena**

Hi Hans,
Just heard someone issued a subpoena to Mike Thomas.
Thought you should know.
Thanks,
Paul

Paul Dulberg
847-497-4250
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I believe he will try and call sometime tomorrow.
Paul

Oh and I know that nothing that happened right after the incident makes any difference as to the validity of the injuries but David's conduct immediately after the incident does show his lack of moral values for other humans and what he was willing and was not willing to do to help me get medical help. For his actions towards me or any other human being is enough to sue the shit out him alone. It is the things that happened afterwards that upset me the most.

Sorry for the rant but Dave was a complete ass all the way and deserves this.

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Sagerman deposition**
Date: December 28, 2016 10:38:55 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: November 15, 2013 at 1:55:11 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Sagerman deposition**

Hi Hans,

Reading through the summary of Dr. Sagermans Deposition I'm curious as to whether Dr. Levin has been deposed? The reason for this question is because of the EMG tests. Dr. Levin only conducted both the tests from just above the scar in the right forearm to the right hand and fingers. She never tested the right elbow which most likely would have identified the compression in the ulnar nerve earlier. She told me she didn't see any reason to give a full test beyond the scarred area even though The Dr asked for a full test of the nerve. She did tell me that all of the branch nerves in the forearm were severed but that is considered minor nerve damage and most likely wouldn't repair itself. Those minor nerves that were ripped out is what caused the loss of feeling in the right forearm and loss of fine motor skills in the areas they control. Again, no major nerve damage was found, only minor nerves but they still hurt like hell and play a significant part.

As far as the MRI, I was told the test cannot tell the difference between scar tissue and good tissue by both Dr. Sagerman and Dr. Levin and neither expected to see much from the test.

As far as proving the elbow is a direct, indirect or hypersensitive result from the chainsaw, I don't think anyone can prove or disprove this let alone bet their medical license on this. All I can say to this is that it never bothered me before the incident and I didn't have any of the numbness or tingling prior to the incident. It is possible that the compression existed before the incident and that the trauma to the arm aggravated the nerve causing a hyper sensitivity resulting in the sensations or lack of them. I don't know how or when the compression in the elbow happened. I believe it happened during the incident but cannot prove it. I was in panic mode followed by extreme shock following the chainsaw being lifted into my arm. All I do know is it didn't bother me at all prior to the chainsaw incident or I would have seen a Dr. about it.

On another note, Dr. Sagermans comment about sitting in front of a computer all day shows he has no idea how repetitious keyboarding is or how much work a graphic designer does. I'm curious as to the context of the question he was asked to reply this way and why he doesn't see typing as an extremely repetitious task requiring good dexterity. Every time I try to go at the keyboard, mouse or even write I don't get very far without suffering a spasm in the damaged muscles. It affects much more than just typing. My grip is shot as well and I have a lot of trouble doing regular daily activities like cooking, cleaning, driving, etc... Those spasms happen anytime I try to use those muscles for more than a few minutes repetitiously. Sit at your keyboard and type with your right hand and feel the muscles in your forearm at the same place the chainsaw entered, dug deep and tore out a huge chunk of my arm and ask yourself if issues in those muscles would affect your ability to type or use your fingers for anything. This is a no brainer, of course they do. I don't believe Dr. Sagerman gave this much thought or may have been asked this question in a context that would put computer keyboarding as a physically non stressful job overall but did not consider the extreme repetition, dexterity or fine motor control it takes to be a professional keyboardist 40-70 hours a week. If all I did was sit in front of a computer all day his statement would be true but to do my job requires one hell of a lot of keyboarding. Wish I could get paid to just sit in front of a computer and not have to type anything. Lol.

On another note, I did not see anything about the self dissolving stitches the Hospital used the day of the incident that never dissolved and Dr. Sagerman had to remove later. He said that accounted for the feeling of needles poking me in my arm and I believe he was right as those feelings stopped after he removed them. That was over a year of feeling those stitches aggravate the forearm and was a huge relief when they were found and removed. Removing those helped to pinpoint the Dystonia.

As far as the disability claim. This incident is what triggered me to file for disability but is only the piece of straw that broke the camels back so to speak and not the sole reason I filed. Disability looks at the whole body and not just this incident. In no way do I suggest the chainsaw is the sole reason I may or may not get disability. It is a cumulation of serious injuries I have suffered that will be the determining factor.

That's all I have for now but I'm sure more will come to mind as time goes on.

Oh, one more thing... You said a trial is like a theatrical production. If we had to go to trial how much approximately would you need in cash to make an overwhelmingly convincing production happen. Let me know so I have an idea of the ballpark figure and can

secure the funds needed.

Hans, I'm asking that when you consider either a settlement or a trial that you ask yourself what it would be worth to you if you had to suffered this type of injury that profoundly changed your day to day living and career.

Thanks again,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: 3 pm meeting**
Date: December 28, 2016 10:39:25 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: November 5, 2013 at 9:46:33 AM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: 3 pm meeting**

Hans,

Below is a link to an article talking about the integration of digital cameras at the centegra facilities.

A friend of mine who works at NIMC for well over a decade just replied to me and she says everything is recorded and available exactly for the purposes we discussed.

<http://www.sdmmaq.com/articles/print/success-stories-in-integrating-video-surveillance>

Paul Dulberg
847-497-4250
Sent from my iPad

On Nov 5, 2013, at 9:00 AM, Hans Mast <hansmast@comcast.net> wrote:

no chance, sorry

----- Original Message -----

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Mon, 04 Nov 2013 22:54:28 -0000 (UTC)
Subject: Re: 3 pm meeting

Also,

Any chance the hospital (centegra) has video of their parking lots?
This could disprove David's claim of talking before entering the ER.

Thanks,

Paul

Paul Dulberg
847-497-4250

Sent from my iPad

On Nov 4, 2013, at 11:49 AM, Hans Mast <hansmast@comcast.net> wrote:

No need to bring anything, your mom is welcome...

----- Original Message -----

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Mon, 04 Nov 2013 17:31:20 -0000 (UTC)
Subject: 3 pm meeting

Hi Hans,

Curious if I should bring anything with me at 3 pm?

Mind if my Mom comes along?

Thanks and see you soon,

Paul

Paul Dulberg
847-497-4250

Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Character reference**
Date: December 28, 2016 10:39:51 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: November 4, 2013 at 9:13:18 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Character reference**

Hi Hans,

Just spoke with John Choyinski a lifelong friend of myself and David Gagnon.

First off I should mention that John has suffered a brain injury in his youth and did spend a few months in a coma and rehab but that was over 20 years ago and he's improved dramatically since. If you should talk with him you will notice something's off about him and I thought the heads up would help. One important note and you have to take my word for this till you talk to him and realize it for yourself, it is that John is damn near incapable of lying. Ask him anything and he's so darn honest he gets himself in trouble and doesn't know it. He often says way too much and I'm sure that can't be good except its what makes him so darn believable.

John is willing to talk about certain aspects of what David has said to him in confidence. John is extremely hesitant to go against David in fear of retribution and rejection from his lifelong friend and is on guard in his reactions and words but this can easily be avoided by asking him questions that skirt around the issue rather than directly at it until he already answered it.

John explained to me tonight that Dave is not the same person I knew a decade ago. These days Dave is all about himself and he has become money hungry. John told me I would have known that if I hadn't been off working all those years and been around more often. John went on to say that he knows that David is lying about how it happened because David seems to think he will have to pay more for insurance and he's so cheap he'd rather screw Paul over than paying 1 penny more or have to admit he did something wrong for no money. John went on to say that David was upset at having to do his Moms tree, didn't want to be there because he wasn't getting money for it and that he was trying to go too fast, didn't tell Paul what he was doing and that's how it happened. At this point Johnny showed confusion and said "um well I mean Paul moved his arm.... Ohhh whatever, I don't want to talk about it any more."

Hans, Johnny is David's longest lasting friend. These two were the closest of buddies growing up. Johnny said he would be willing to talk with you not to go against David but because he knows the troubles I have doing normal things that I used to be able to do very well.

If you start by asking Johnny about my grip or things I have trouble with like hand shakes or opening jars, writing or typing he will go on and on, he needs to be guided a bit in the right direction and soon you will have what you should need about his conversations with David.

But be forewarned, Johnny can go off on tangents and most of what you hear won't have anything to do with what he is there for and I'm more than positive he will say things that will ruin his own credibility.

When I asked johnny if it was ok for you to speak with him he said yes but to give you his home number and not his cell because he doesn't answer calls if he doesn't know the number. He also went on to say his parents told him to stay out of the issue between Dave and I because of David. They fear David may do something drastic if he feels Johnny went against him.

Best time to call him at home is either early morning before 9 am or at 6 pm but he is in and out all day.

John Choyinski Jr.
Home. (815) 385-8483

Hans, John has issues and may not make the best witness in my opinion but he is Dave's lifelong friend and if handled correctly can't lie or should I say can't keep one up for very long.

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: 3 pm meeting**
Date: December 28, 2016 10:40:40 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: November 4, 2013 at 4:54:28 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: 3 pm meeting**

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Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Nov 4, 2013, at 11:49 AM, Hans Mast <hansmast@comcast.net> wrote:

No need to bring anything, your mom is welcome...

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From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Mon, 04 Nov 2013 17:31:20 -0000 (UTC)
Subject: 3 pm meeting

Hi Hans,
Curious if I should bring anything with me at 3 pm?
Mind if my Mom comes along?
Thanks and see you soon,

Paul
Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: 3 pm meeting**
Date: December 28, 2016 10:40:19 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: November 4, 2013 at 4:54:28 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: 3 pm meeting**

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Paul Dulberg
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Sent from my iPad

On Nov 4, 2013, at 11:49 AM, Hans Mast <hansmast@comcast.net> wrote:

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To: Hans Mast <hansmast@comcast.net>
Sent: Mon, 04 Nov 2013 17:31:20 -0000 (UTC)
Subject: 3 pm meeting

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Paul
Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: 3 pm meeting**
Date: December 28, 2016 10:41:15 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: November 4, 2013 at 4:52:23 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: 3 pm meeting**

Hans,

I forgot to take a copy of dr Sagermans dep. when I was there.

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Nov 4, 2013, at 11:49 AM, Hans Mast <hansmast@comcast.net> wrote:

No need to bring anything. your mom is welcome...

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Sent: Mon, 04 Nov 2013 17:31:20 -0000 (UTC)
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Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: Fwd: 3 pm meeting
Date: December 28, 2016 10:41:41 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: November 4, 2013 at 11:31:20 AM CST
To: Hans Mast <hansmast@comcast.net>
Subject: 3 pm meeting

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Mind if my Mom comes along?

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Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical depositions**
Date: December 28, 2016 10:42:42 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: October 30, 2013 at 2:57:50 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Medical depositions**

Hans,

I don't believe that any reasonable person sitting in a jury is going to give dr talerico's 5 minute evaluation much credit next to dr Sagerman's extensive examinations. I'd bet the farm on Dr. Sagerman over Talerico any day.

Next issue?

Paul Dulberg
847-497-4250
Sent from my iPad

On Oct 30, 2013, at 2:08 PM, Hans Mast <hansmast@comcast.net> wrote:

I understand that Paul. The problem is that you are preaching to the choir. The jury - that will decide this case - doesn't know you or the doctor. If a treating doctor says he doesn't think you were injured badly, they can accept it or believe it. That is the jury's job. And in cases that have complicated medical issues, many times the jury will not be so accommodating and give you the benefit of the doubt. That's why Plaintiff's always have a more difficult time at trial, because they have the burden of proof. And, if the jury doesn't like the evidence they can find against you.

----- Original Message -----

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Wed, 30 Oct 2013 18:26:57 -0000 (UTC)
Subject: Re: Medical depositions

Lol, ok.

Hans, if your sick and this dr you don't know says your not, do you go see someone else or do you take his word for it and continue to suffer?

Ask dr Talerico that question.

This dr Talerico guy has no intimate knowledge of my injuries other than 2 very short visits that I walked out of feeling like I was waisting my time because there was no real examination.

I don't even agree with paying for his services.

I have been seeing Dr. Levin and Dr. Sagerman for a couple of years now. And I get to choose who is the best dr for me. Not David or his insurance.

Paul Dulberg
847-497-4250
Sent from my iPad

On Oct 30, 2013, at 1:09 PM, Hans Mast <hansmast@comcast.net> wrote:

Yes. That's how it works.
Sent from my iPhone

On Oct 30, 2013, at 12:57 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

Quick ?

Are they pitting Dr. Talerico against My other dr's?

He only saw me twice for approx 5-10 minutes and there is a reason I stopped seeing dr Talerico.

Paul Dulberg
847-497-4250
Sent from my iPad

On Oct 30, 2013, at 9:34 AM, Hans Mast <hansmast@comcast.net> wrote:

Paul, here are my thoughts regarding your case. There are two issues. The first liability, or whether Mr. Gagnon is liable for your injury. If he is not proven liable, then it does not matter how badly you were hurt since he will not be found responsible for your damages. The second issue is your damages, or to what extent you were injured due to Mr. Gagnon's acts.

Both of these issues are strongly contested in your case.

As to liability, there were no witnesses to the accident. So, whether Mr. Gagnon will be held responsible for your damages is uncertain and a gamble. That is because it is your word against his word. Our argument is that you were simply holding a limb when he caused the chain saw to strike you. His argument is that you moved your arm in the path of the chain saw unexpectedly. If the jury determines that we did not prove your "version" of the accident, then they can find against you and in favor of Mr. Gagnon at trial.

As to damages, the issue is complicated. That is because your treating physicians do not all agree on exactly what injury you suffered or whether you had a fully recovery or not.

Dr. Talerico at MidAmerica Hand and Shoulder, saw you twice. The first time was in December, six months after your injury. He was not supportive of your claim in most respects. He didn't really feel there was anything wrong with you - as to the forearm. He said that you complained mostly of pain radiating down the forearm from the laceration site with numbness and tingling. On exam he noted no tenderness and it was mostly a normal presentation. Strength was good. He did not see any nerve problem. He prescribed physical therapy due to a muscular sort of symptomology - not nerve related. Apparently you did only 2 sessions of therapy and returned January, 2012. No new complaints at the time. The EMG was normal. He did not believe you were disabled. He continued you on therapy. He saw no evidence of nerve problems. The only symptoms were subjective - not represented by any abnormal exam finding.

Dr. Sagerman has also been deposed. I will summarize his testimony for you soon. His was more favorable, but still limited in what he related to the chain saw accident. Apparently he does not believe you presently have any symptoms relatable to the chain saw injury.

Think about these issues. I will provide you Dr. Sagerman's summary soon.

Hans

----- Original Message -----

From: Paul Dulberg <pdulberg@comcast.net>

To: Hans Mast <hansmast@comcast.net>

Sent: Fri, 25 Oct 2013 13:18:24 -0000 (UTC)

Subject: Medical depositions

Morning Hans,

Wanted to touch base this morning because the call from you about something not being medically linked has been on my mind.

I'm not sure what was said during that deposition with the drs that prompted the call but I have been thinking about what it could be. Most likely it was the right elbow procedure.

During my deposition I remember being asked if the two were linked and I answered yes. Let me explain my answer to you.

If the chainsaw had not gone through my arm then the procedure on my elbow wouldn't have happened. That procedure was exploratory to find what was bothering the arm from the chainsaw. Upon opening up the arm they did find some compressions which from my understanding was nothing unusual for a male of my age and very well may or may not have happened during my retreat from the

chainsaw when I ended up half way across the yard on the ground. Incidental finding or not it still would not have been found if I hadn't had the chainsaw incident. So as I see it they are linked good or bad and cannot be separated. The exploratory procedure was to find and possibly fix issues relating to the chainsaw incident. They also removed a ton of scar tissue in the forearm on the same day during the same exploratory procedure that was a direct result of the chainsaw.

Hope this helps explain things better.

Let me know,

Thanks,

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical depositions**
Date: December 28, 2016 10:43:24 AM CST
To: paul_dulberg@comcast.net

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Date: October 30, 2013 at 1:26:57 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Medical depositions**

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During my deposition I remember being asked if the two were linked and I answered yes. Let me explain my answer to you.

If the chainsaw had not gone through my arm then the procedure on my elbow wouldn't have happened. That procedure was exploratory to find what was bothering the arm from the chainsaw. Upon opening up the arm they did find some compressions which from my understanding was nothing unusual for a male of my age and very well may or may not have happened during my retreat from the chainsaw when I ended up half way across the yard on the ground. Incidental finding or not it still would not have been found if I hadn't had the chainsaw incident. So as I see it they are linked good or bad and cannot be separated. The exploratory procedure was to find and possibly fix issues relating to the chainsaw incident. They also removed a ton of scar tissue in the forearm on the same day during the same exploratory procedure that was a direct result of the chainsaw.

Hope this helps explain things better.

Let me know,

Thanks,

Paul

Paul Dulberg

847-497-4250

Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical depositions**
Date: December 28, 2016 10:44:22 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: October 25, 2013 at 8:18:24 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Medical depositions**

Morning Hans,

Wanted to touch base this morning because the call from you about something not being medically linked has been on my mind. I'm not sure what was said during that deposition with the drs that prompted the call but I have been thinking about what it could be. Most likely it was the right elbow procedure.

During my deposition I remember being asked if the two were linked and I answered yes. Let me explain my answer to you. If the chainsaw had not gone through my arm then the procedure on my elbow wouldn't have happened. That procedure was exploratory to find what was bothering the arm from the chainsaw. Upon opening up the arm they did find some compressions which from my understanding was nothing unusual for a male of my age and very well may or may not have happened during my retreat from the chainsaw when I ended up half way across the yard on the ground. Incidental finding or not it still would not have been found if I hadn't had the chainsaw incident. So as I see it they are linked good or bad and cannot be separated. The exploratory procedure was to find and possibly fix issues relating to the chainsaw incident. They also removed a ton of scar tissue in the forearm on the same day during the same exploratory procedure that was a direct result of the chainsaw.

Hope this helps explain things better.

Let me know,

Thanks,

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Depositions**
Date: December 28, 2016 10:45:06 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: October 22, 2013 at 1:24:09 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Depositions**

Hi Hans,
I'm not sure what you meant by saying there was no medical link from dr Sagermans deposition.
Medical link to what?
Weakness, spasms, loss of feeling, etc...
What has to be linked and why?
Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: SSDI update for Dr's appointment today**
Date: December 28, 2016 10:45:38 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: September 25, 2013 at 12:53:08 PM CDT
To: Hans Mast <hansmast@comcast.net>, Janet Douglass <janet@ssdatty.com>
Subject: **SSDI update for Dr's appointment today**

Hi Hans and Janet,

Today I met with Dr. Kathryn Kujawa at Alexian brothers hospital. She diagnosed my right arm as task specific Focal Dystonia and said it can be treated on a temporary basis with Botox injections every 3 months or so. My next appointment is for November 19th at 9:45 am to start the treatments. She said it is definitely caused from the trauma in my right arm. I have included her offices contact info below.

If you need anything else please let me know.

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

Dr. Kathryn Kujawa
Eberle Building, 800 Biesterfield Road, Suite 610
Elk Grove Village, IL. 60007
847-981-3630

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Deposition**
Date: December 28, 2016 10:46:32 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: September 20, 2013 at 11:21:26 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Fwd: Deposition**

Hi Hans,

Just spoke with Mike Thomas and he doesn't want to call you because he is afraid of getting caught by the IRS for paying me in cash.

Tried to tell him how he paid me doesn't matter but he's afraid and doesn't want to get involved.

Here is all the contact info I have on him.

Mike Thomas
Winning Promotions, LLC

Phone:
(262) 758-8966

Email:
mike@winpromos.com

Website:
<http://www.winpromos.com/>

Work address:
5512 May Ave
Richmond IL 60071
United States

Home address:
460 Waldeck Drive
Twin Lakes WI 53181
United States

Paul Dulberg
847-497-4250
Sent from my iPad

Begin forwarded message:

From: Paul Dulberg <pdulberg@comcast.net>
Date: September 20, 2013, 10:41:27 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Deposition**

Hi Hans,
I sent Mike Thomas your contact info.
Please let me know if he calls.
Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Sep 20, 2013, at 10:12 AM, Hans Mast <hansmast@comcast.net> wrote:

Paul...we need to set his deposition. Can you have him call me.. thanks

----- Original Message -----

From: Paul Dulberg <pdulberg@comcast.net>

To: Hans Mast <hansmast@comcast.net>

Sent: Thu, 19 Sep 2013 16:04:55 -0000 (UTC)

Subject: Deposition

Hi Hans,

Received a call yesterday from your secretary concerning Mike Thomas. I'm not really sure what she was asking. Something about treating him as a hostile witness or something?

Give me a call.

Thanks,

Paul

Paul Dulberg

847-497-4250

Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Deposition**
Date: December 28, 2016 10:46:57 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: September 20, 2013 at 11:09:01 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Deposition**

Hans,

Mike Thomas just told me he doesn't want to be involved because he is afraid that it will be found out he paid me in cash rather than a 1099 or w2 and he doesn't want any trouble with the IRS.
I tried to tell him none of that matters but he is afraid and won't call you.

Here is his contact info if you want to try.

Mike Thomas

Mobile:

(262) 758-8966

Email:

mike@winpromos.com

Website:

<http://www.winpromos.com/>

Home:

460 Waldeck Drive

Twin Lakes WI 53181

United States

Work:

5512 May Ave

Richmond IL 60071

United States



Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

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----- Original Message -----

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To: Hans Mast <hansmast@comcast.net>

Sent: Thu, 19 Sep 2013 16:04:55 -0000 (UTC)

Subject: Deposition

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Give me a call.

Thanks,

Paul

Paul Dulberg

847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Deposition**
Date: December 28, 2016 10:47:25 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: September 20, 2013 at 10:41:27 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Deposition**

Hi Hans,
I sent Mike Thomas your contact info.
Please let me know if he calls.
Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Sep 20, 2013, at 10:12 AM, Hans Mast <hansmast@comcast.net> wrote:

Paul...we need to set his deposition. Can you have him call me.. thanks
----- Original Message -----

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Thu, 19 Sep 2013 16:04:55 -0000 (UTC)
Subject: Deposition

Hi Hans,
Received a call yesterday from your secretary concerning Mike Thomas. I'm not really sure what she was asking. Something about treating him as a hostile witness or something?
Give me a call.

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Deposition**
Date: December 28, 2016 10:47:57 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: September 19, 2013 at 11:04:55 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: Deposition

Hi Hans,
Received a call yesterday from your secretary concerning Mike Thomas. I'm not really sure what she was asking. Something about treating him as a hostile witness or something?
Give me a call.
Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: SSDI**
Date: December 28, 2016 10:49:02 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: September 13, 2013 at 10:21:46 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Fwd: SSDI**

Hi Hans,

I sent the letter below to Janet the person helping with SSDI.
Thought I would ask you the same.

Begin forwarded message:

From: Paul Dulberg <pdulberg@comcast.net>
Date: September 13, 2013, 10:06:45 AM CDT
To: Janet Douglass <janet@ssdatty.com>
Subject: **SSDI**

Hi Janet,

Not sure if your the right person to ask this question but thanks in advance for any insight or help you may be able to provide.

Is it ok to file for bankruptcy while applying for SSDI?

If so, do you work with anyone who handles this?

I have been living off of credit cards for over 2 years now since I was injured and my mom was paying the minimum payments for me. The minimum payments are going to exceed what she can afford. She also pays my mortgage payment every month. It's too much and I have to do something. I have never considered bankruptcy before and know nothing about it. I would like to keep my house if it is possible. I don't have anything else of real value. Most of the credit card usage was for gasoline and medical treatment.

Thanks again in advance for any insight or help you may have,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical/SSDI update**
Date: December 28, 2016 10:49:46 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: August 28, 2013 at 11:21:00 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Medical/SSDI update**

Hi Hans,

Thanks for the reminder on the bills. Should have new printouts of the totals by next week.

I have scheduled an appointment with Dr. Kathleen Kujawa on November 14th, 2:30pm at alexian brothers hospital for an evaluation/consultation to see if is in fact Dystonia affecting the severed muscles and branch nerves in my right arm.

Dr. Sagerman told me to finish physical therapy at home for the left arm and left scheduling another visit up to me if I should need it.

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Aug 26, 2013, at 4:41 PM, Hans Mast <hansmast@comcast.net> wrote:

Paul. Thanks for the update. Each time you follow up with your drs. please get a new itemized print out of your entire bill so we can keep the billing "report" updated. I'll send you what bills i have so you can see what we're missing.

Thanks
Hans

----- Original Message -----

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>, Janet Douglass <janet@ssdatty.com>
Sent: Mon, 26 Aug 2013 17:32:06 -0000 (UTC)
Subject: Medical/SSDI update

Hi

Had an appointment with Dr. Sagerman today. He called Dr. Levin and discussed Dystonia in the muscle in my right arm that was cut with the chainsaw. They are sending me to another Dr. who specializes in Dystonia. Her name is Dr. Kathleen Kujawa. I will send you a note when the appointment is.

Thanks,

Paul
Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical/SSDI update**
Date: December 28, 2016 10:49:46 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: August 28, 2013 at 11:21:00 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Medical/SSDI update**

Hi Hans,

Thanks for the reminder on the bills. Should have new printouts of the totals by next week.

I have scheduled an appointment with Dr. Kathleen Kujawa on November 14th, 2:30pm at alexian brothers hospital for an evaluation/consultation to see if is in fact Dystonia affecting the severed muscles and branch nerves in my right arm.

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Paul

Paul Dulberg
847-497-4250
Sent from my iPad

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Thanks
Hans

----- Original Message -----

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>, Janet Douglass <janet@ssdatty.com>
Sent: Mon, 26 Aug 2013 17:32:06 -0000 (UTC)
Subject: Medical/SSDI update

Hi

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Thanks,

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical/SSDI update**
Date: December 28, 2016 10:50:37 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: August 26, 2013 at 12:32:06 PM CDT
To: Hans Mast <hansmast@comcast.net>, Janet Douglass <janet@ssdattv.com>
Subject: **Medical/SSDI update**

Hi

Had an appointment with Dr. Sagerman today. He called Dr. Levin and discussed Dystonia in the muscle in my right arm that was cut with the chainsaw. They are sending me to another Dr. who specializes in Dystonia. Her name is Dr. Kathleen Kujawa. I will send you a note when the appointment is.

Thanks,

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical deps**
Date: December 28, 2016 10:51:24 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: August 16, 2013 at 3:56:33 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Medical deps**

Hi Hans,

Just received your letter notifying me of the medical round of deps.
Thanks for the update.

On another note, I went in to see Dr. Levin earlier this week. She said I'm stuck with something called Dystonia in my right arm. Not sure exactly what that is yet but I do have to see dr Sagerman on the 26th and plan to ask about it.

Thanks again for keeping me updated.
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Physical Therapy**
Date: December 28, 2016 10:52:14 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: August 7, 2013 at 10:18:40 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Physical Therapy**

Hi Hans,

I've decided to just pay out of pocket for the physical therapy sessions. It needs to be done irregardless.

I am curious as to where we are at with the lawsuit. Any updates would be appreciated.

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Jul 25, 2013, at 1:28 PM, Hans Mast <hansmast@comcast.net> wrote:

Thanks Paul for the update...

as before, while the case is pending, there really is no way to pay the expense until the suit is settled or goes to trial....

Some providers will hold a Lien on the case which guarantees payment when the case settles...not sure if they will, but that is the only way to do it without medical health insurance.

----- Original Message ----- From: Paul Dulberg <pdulberg@comcast.net> To: Hans Mast <hansmast@comcast.net> Sent: Wed, 24 Jul 2013 14:09:26 -0000 (UTC) Subject: Physical Therapy
Morning Hans, I started physical therapy after the cortisone shot at Fox Lake Dynamic Hand Therapy yesterday. They notified me that I owe something around \$25,000.00 and that they just had to close one of their clinics and that they were not willing to take on more at this time. After talking with them for a while they asked me to contact you to see where we are at as far as paying the bill and told me to ask you about how to pay for this round of visits. I paid out of pocket for yesterday's session. Thanks again for everything, Paul Paul Dulberg 847-497-4250 Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Physical Therapy**
Date: December 28, 2016 10:52:56 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: July 24, 2013 at 9:09:26 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Physical Therapy**

Morning Hans,

I started physical therapy after the cortisone shot at Fox Lake Dynamic Hand Therapy yesterday.

They notified me that I owe something around \$25,000.00 and that they just had to close one of their clinics and that they were not willing to take on more at this time. After talking with them for a while they asked me to contact you to see where we are at as far as paying the bill and told me to ask you about how to pay for this round of visits.

I paid out of pocket for yesterday's session.

Thanks again for everything,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Med update and SSDI update**
Date: December 28, 2016 10:53:37 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: July 8, 2013 at 3:36:21 PM CDT
To: Hans Mast <hansmast@comcast.net>, Janet Douglass <janet@ssdatty.com>
Subject: **Med update and SSDI update**

Hi Hans and Janet,

Sorry for sending you both the same letter but you both need the info.

I saw Dr. Sagerman today. He gave me an injection of cortisone and prescribed 6 more weeks of physical therapy.
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Anything to update?**
Date: December 28, 2016 10:54:21 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: July 1, 2013 at 9:39:41 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: Re: Anything to update?

Ok,
Thanks

One more thing. I am calling dr Sagerman this morning to set up an appointment. He offered cortisone shots and I had decided to give it more time to heal. Enough Time has passed and it has improved but still catches me off guard and is quite acute so I'm going to go ahead with the shots. I'll let you know.

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Jul 1, 2013, at 9:33 AM. Hans Mast <hansmast@comcast.net> wrote:

Nothing new to report. There is that "guy" we talked about recently that the Defense may want to depose. Otherwise, they can start deposing your doctors....

----- Original Message ----- From: Paul Dulberg <pdulberg@me.com> To: Hans Mast <hansmast@comcast.net> Sent: Fri, 28 Jun 2013 22:27:24 -0000 (UTC) Subject: Anything to update? Hi Hans, Just wondering where things are at? Thanks, Paul Paul Dulberg 847-497-4250 Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: Fwd: Expense report
Date: December 28, 2016 10:54:51 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: June 6, 2013 at 7:45:37 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: Expense report

Hi Hans,
The latest expense report sent on May 28th looks like you have everything covered.
Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Contact info for Mike Thomas**
Date: December 28, 2016 10:55:16 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: June 5, 2013 at 12:14:12 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Contact info for Mike Thomas**

Hi Hans,
Missed your call this morning. I'm here all day so feel free to call when you have time.

I'd suppose they want to know what I did for Mike Thomas.

Here is a brief summary,

I placed an ad to sell off some printing equipment and Mike Thomas came out to see if he wanted anything. This was the first time I met him.

In the process he mentioned that he was setting up a print shop in Richmond IL and asked if we (Mike McArtor and myself) could help. We did help him on and off over the next few months. Mike McArtor still helps out to this day and I do offer them advise when asked. My brother Scott Dulberg and Tom Kost also help Mike Thomas from time to time.

Mike Thomas wanted me to work for him on a regular basis. He offered many different proposals from direct employment, sub contracting, part time, etc... I had to decline after a few months of working with him on and off because I knew I couldn't do that type of work anymore on a regular basis. My arms and hands just can't be relied on.

Working with Mike Thomas taught me what I was and was not capable of doing. I did try to do many things for Mike Thomas that probably was things that I now know I shouldn't do anymore. I had to try, how would I know what i could do if I didn't.

It was a good test to see if I could go back to work on a regular basis. I did try many different types of work for Mike Thomas. It was everything from graphic design to doing little fix it up jobs around his building and even his house in Twin Lakes WI. I introduced my brothers, Scott & Tom, to Mike Thomas to recruit their help with what needed to be done because I wasn't able to do all the things myself anymore. All three, Tom, Mike McArtor and Scott filled in and acted as my hands to get things done.

I did receive compensation in the form of cash for my time. It wasn't much perhaps a few thousand in total but I'm not exactly sure what the exact total was. All the money went to my mother to help out with the bills she was paying on my behalf.

Other than that there isn't anything else I can think of that the defense counsel could hope to get from him.

Feel free to call or I could come in to discuss.

Thanks again,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Jun 4, 2013, at 5:14 PM, Hans Mast <hansmast@comcast.net> wrote:

Thanks. Lets talk Wed about what he might say if deposed in your case.

Sent from my iPhone

On Jun 4, 2013, at 3:55 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

Hi Hans,
Mike McArtor does work with Mike Thomas from time to time.
Here is the contact info for Mike Thomas.
<Mike Thomas.vcf>

Please let me know if the .vcf file worked. If not I can type out the info.

Thanks,

Paul

Paul Dulberg

847-497-4250

Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Contact info for Mike Thomas**
Date: December 28, 2016 10:55:43 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: June 4, 2013 at 7:18:58 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Contact info for Mike Thomas**

Ok, just let me know when

Paul Dulberg
847-497-4250
Sent from my iPad

On Jun 4, 2013, at 5:14 PM, Hans Mast <hansmast@comcast.net> wrote:

Thanks. Lets talk Wed about what he might say if deposed in your case.

Sent from my iPhone

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Please let me know if the .vcf file worked. If not I can type out the info.
Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Update**
Date: December 28, 2016 10:57:02 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: April 29, 2013 at 8:03:03 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: Re: Update

Hi Hans,

Thanks for the update.
Thanks for everything.

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Apr 26, 2013, at 2:41 PM, Hans Mast <hansmast@comcast.net> wrote:

Nothing new....the defense has time to depose any of your doctors....we're just waiting for them to take the next step....

----- Original Message -----

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Fri, 26 Apr 2013 19:33:07 -0000 (UTC)
Subject: Update

Hi Hans.

It's been a while, thought I'd say hi and check in to see if you need anything.
Let me know how things are going.

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Update**
Date: December 28, 2016 10:57:02 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: April 29, 2013 at 8:03:03 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: Re: Update

Hi Hans,

Thanks for the update.
Thanks for everything.

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Apr 26, 2013, at 2:41 PM, Hans Mast <hansmast@comcast.net> wrote:

Nothing new....the defense has time to depose any of your doctors....we're just waiting for them to take the next step....

----- Original Message -----

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Fri, 26 Apr 2013 19:33:07 -0000 (UTC)
Subject: Update

Hi Hans.

It's been a while, thought I'd say hi and check in to see if you need anything.
Let me know how things are going.

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Contact info for Mike Thomas**
Date: December 28, 2016 10:56:14 AM CST
To: paul_dulberg@comcast.net
▶ 1 Attachment, 0.5 KB

From: Paul Dulberg <pdulberg@comcast.net>
Date: June 4, 2013 at 3:55:20 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Contact info for Mike Thomas**

Hi Hans,
Mike McArtor does work with Mike Thomas from time to time.
Here is the contact info for Mike Thomas.



Mike Thomas.vcf (0.5 KB)

Please let me know if the .vcf file worked. If not I can type out the info.
Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Update**
Date: December 28, 2016 11:04:59 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: April 26, 2013 at 2:33:07 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Update**

Hi Hans,

It's been a while, thought I'd say hi and check in to see if you need anything.
Let me know how things are going.

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical Expense Report**
Date: December 28, 2016 11:05:39 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: April 8, 2013 at 4:38:43 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Medical Expense Report**

Hi Hans,

I dropped off the billing today. There is still dynamic hand therapy and Dr. Sagerman who have more to add to the list.

If you have any questions please let me know.

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Mar 15, 2013, at 3:23 PM, Hans Mast <hansmast@comcast.net> wrote:

Thanks

----- Original Message -----

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Fri, 15 Mar 2013 19:36:02 -0000 (UTC)
Subject: Medical Expense Report

Hi Hans.

Just received the medical expense report you sent via us post office.
The total amount of \$40,633.00 is wrong. There are several charges missing.
It will take me a few days to gather all the totals from the various Dr.'s, therapists, pharmacies, hospitals, etc...

The Tennis elbow is being treated by Dr. Sagerman and Dynamic Hand therapy.
Hopefully no surgery will be needed. Keeping my fingers crossed.

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical Expense Report**
Date: December 28, 2016 11:06:27 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: March 26, 2013 at 12:13:15 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: Re: Medical Expense Report

Understood

Paul Dulberg
847-497-4250
Sent from my iPad

On Mar 26, 2013, at 11:27 AM. Hans Mast <hansmast@comcast.net> wrote:

Honestly, that might be difficult for several reasons. Not only will it be impossible to prove that it is due to the trauma, but it may open up the issue before the jury of whether you are a credible witness..so Id be against that frankly....

----- Original Message -----

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Tue, 26 Mar 2013 16:23:26 -0000 (UTC)
Subject: Re: Medical Expense Report

Should I be adding treatment and meds for depression?

Paul Dulberg
847-497-4250
Sent from my iPad

On Mar 15, 2013, at 3:23 PM, Hans Mast <hansmast@comcast.net> wrote:

Thanks

----- Original Message -----

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Fri, 15 Mar 2013 19:36:02 -0000 (UTC)
Subject: Medical Expense Report

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Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical Expense Report**
Date: December 28, 2016 11:06:53 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: March 26, 2013 at 11:23:26 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: Re: Medical Expense Report

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Paul Dulberg
847-497-4250
Sent from my iPad

On Mar 15, 2013, at 3:23 PM, Hans Mast <hansmast@comcast.net> wrote:

Thanks

----- Original Message -----

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To: Hans Mast <hansmast@comcast.net>
Sent: Fri, 15 Mar 2013 19:36:02 -0000 (UTC)
Subject: Medical Expense Report

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Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical Expense Report**
Date: December 28, 2016 11:07:20 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: March 25, 2013 at 11:48:55 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: Re: Medical Expense Report

Hi Hans,
Sorry it's taking a bit longer than I thought it would. Should have everything this week.
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Mar 15, 2013, at 3:23 PM, Hans Mast <hansmast@comcast.net> wrote:

Thanks

----- Original Message -----

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Fri, 15 Mar 2013 19:36:02 -0000 (UTC)
Subject: Medical Expense Report

Hi Hans,

Just received the medical expense report you sent via us post office.
The total amount of \$40,633.00 is wrong. There are several charges missing.
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Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical Expense Report**
Date: December 28, 2016 11:08:02 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: March 15, 2013 at 2:36:02 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Medical Expense Report**

Hi Hans,

Just received the medical expense report you sent via us post office.
The total amount of \$40,633.00 is wrong. There are several charges missing.
It will take me a few days to gather all the totals from the various Dr.'s, therapists, pharmacies, hospitals, etc...

The Tennis elbow is being treated by Dr. Sagerman and Dynamic Hand therapy.
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Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Reply to David's Deposition**
Date: December 28, 2016 11:09:28 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: February 13, 2013 at 2:49:52 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Reply to David's Deposition**

Hans,

Mike is what/who your looking for. He seen and heard David's rant and threat about a lawsuit and any possible monies paid out. I expect him to be off work around 6 pm and I'm sure once he gets your message he will call you.

I'm not sure Mike has even thought about that event since it happened but he doesn't forget things too easily. I'm sure whatever he remembers he would be happy to testify to.

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Feb 13, 2013, at 2:40 PM, Hans Mast <hansmast@comcast.net> wrote:

I dont need the letter..I need witnesses who can show that what he's saying isn't true...

----- Original Message -----

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Wed, 13 Feb 2013 20:25:57 -0000 (UTC)
Subject: Re: Reply to David's Deposition

Hans,

Do you remember the email I sent with all the drama when I met with David?
Mike was there, seen and heard everything. Mike will tell you what he heard and watched.
If you don't have the drama letter I can try and find it and resend it.

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Feb 13, 2013, at 1:41 PM, Hans Mast <hansmast@comcast.net> wrote:

Thanks ...I just called him and left him a message. I need to know what he is going to say and when he can give a dep at our offices.

----- Original Message -----

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Wed, 13 Feb 2013 19:14:56 -0000 (UTC)
Subject: Re: Reply to David's Deposition

Hi Hans,

Mike McArtor is at work today and will be working everyday this week.
His cell phone is (815) 347-8014.
Mike is willing to do a deposition but needs to schedule it around work.

Thanks again,
Paul

Paul Dulberg

847-497-4250
Sent from my iPad

On Feb 13, 2013, at 12:51 PM, Hans Mast <hansmast@comcast.net> wrote:

Thanks Paul...

Every case has different versions of the same accident. Unfortunately, when there are no witnesses, it's hard to know how the jury will decide a case. David's description of the accident made sense to him and he described it in a way that "could have" occurred even though different from your description. I think the only way to prove him wrong is to show him to be incredible in other ways...for instance his assertion that you told him "you could be rich" in front of your room mate. If your room mate will cooperate and say that David is wrong - that you did not say this, this could be a very good way to show him to be wrong. Would your room mate agree to a deposition in the case? if so, have him call me...thanks Paul....

----- Original Message -----

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Wed, 13 Feb 2013 18:03:09 -0000 (UTC)
Subject: Reply to David's Deposition

Hans,

In response to your letter about Gagnon's deposition:

In the first place, why would I hold up the very end of a branch with my damaged left arm? And if I did do it as Dave Gagnon said, I would have had my back to him. What he said makes no sense.

In the second place, if you have ever been cut by a chain saw, the last thing on anyone's mind would be making a profit. I was in so much pain that I could not have talked seriously about anything other than stopping the bleeding and getting to a hospital fast.

David did not come into the hospital with me. He dropped me at the door and was parking the car. He was brought into the ER and questioned by the staff that was there. You can check with whoever was working the ER that day. It's not really my word against David's but David's word against those that were working in the ER.

There is one witness as to David talking about making money off of this accident. Mike Mcartor heard David say this to me in David's garage the day I went up to David's house to get his home owner's insurance policy number per your request. Mike Mcartor is a friend that grew up with David and myself and is currently living at my residence.

Will sign and drop off the medical release forms you requested.

Thanks.
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Reply to David's Deposition**
Date: December 28, 2016 11:10:05 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: February 13, 2013 at 2:25:57 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Reply to David's Deposition**

Hans,

Do you remember the email I sent with all the drama when I met with David?
Mike was there, seen and heard everything. Mike will tell you what he heard and watched.
If you don't have the drama letter I can try and find it and resend it.
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Feb 13, 2013, at 1:41 PM, Hans Mast <hansmast@comcast.net> wrote:

Thanks ...I just called him and left him a message. I need to know what he is going to say and when he can give a dep at our offices.

----- Original Message -----

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Wed, 13 Feb 2013 19:14:56 -0000 (UTC)
Subject: Re: Reply to David's Deposition

Hi Hans,

Mike McArtor is at work today and will be working everyday this week.
His cell phone is (815) 347-8014.
Mike is willing to do a deposition but needs to schedule it around work.

Thanks again,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

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Thanks Paul...

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From: Paul Dulberg <pdulberg@comcast.net>

To: Hans Mast <hansmast@comcast.net>

Sent: Wed, 13 Feb 2013 18:03:09 -0000 (UTC)

Subject: Reply to David's Deposition

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David did not come into the hospital with me. He dropped me at the door and was parking the car. He was brought into the ER and questioned by the staff that was there. You can check with whoever was working the ER that day. It's not really my word against David's but David's word against those that were working in the ER.

There is one witness as to David talking about making money off of this accident. Mike Mcartor heard David say this to me in David's garage the day I went up to David's house to get his home owner's insurance policy number per your request. Mike Mcartor is a friend that grew up with David and myself and is currently living at my residence.

Will sign and drop off the medical release forms you requested.

Thanks.
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Reply to David's Deposition**
Date: December 28, 2016 11:10:36 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: February 13, 2013 at 1:14:56 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: Re: Reply to David's Deposition

Hi Hans,

Mike McArtor is at work today and will be working everyday this week.
His cell phone is (815) 347-8014.
Mike is willing to do a deposition but needs to schedule it around work.

Thanks again,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

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To: Hans Mast <hansmast@comcast.net>
Sent: Wed, 13 Feb 2013 18:03:09 -0000 (UTC)
Subject: Reply to David's Deposition

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Will sign and drop off the medical release forms you requested.

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Reply to David's Deposition**
Date: December 28, 2016 11:11:11 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: February 13, 2013 at 12:03:09 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Reply to David's Deposition**

Hans,

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Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Deposition**
Date: December 28, 2016 11:12:36 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: January 25, 2013 at 9:03:00 AM CST
To: Hans Mast <hansmast@comcast.net>
Subject: Re: Deposition

Morning Hans,
Yes, I'm curious and nervous, how bad did I screw up yesterday?
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Jan 17, 2013, at 12:46 PM, Hans Mast <hansmast@comcast.net> wrote:

Thanks for the update. When you are better call my assitant Sheila to schedule another preparation meeting. You are a nice person, but in law, nice people finish last. You need to think a lot about coming in with a more laid back and non-responsive approach. The more you talk in a deposition, the more you are losing the case. I think I want to be more strict with you on the "5 words" rule, and have you get comfortable with not exceeding 5 words in any answer. Im gonna ask a lot of you, but you need to do this in order to maximize your recovery in the case.

Here are some thoughts and examples of how you need to testify:

Best 3 responses: "Yes" "No" or "I don't know"

Otherwise, answer only that which is asked - no more

If asked for your name - give your name, not anything more (ie. Address...date of birth..)

Give answers 5 or less words in length

Don't use "because" or ever explain your answers.

If asked to explain, say only what is necessary in 5 words or less

Remember, your purpose is not to make sure the other attorney understands what you are saying. This is not your concern. If the attorney does not understand you, it is HIS job to ask the questions to make him understand. Your only purpose is to answer questions. Therefore, you should not be concerned if the attorney is not understanding you. Therefore, do not worry about explaining yourself in the best most understanding way. Just simply answer the questions.

Do NOT speculate about anything. If you do not know something, say so - Don't guess!

The more you talk, the more information you are giving to be used later against you - it doesn't matter if you think you are saying things to help your case since the more information you give the more the attorney will ask questions and delve into matters that may not otherwise come up - ultimately obtaining information that could be damaging to your case.

Your job at the deposition is only to answer the questions asked of you

Your purpose at the deposition is NOT to explain, convince, argue or otherwise defend your case. If the attorney questioning you does not seem to understand something about your case, TOO BAD. Unless asked a specific question on a matter, you are not to explain or clarify things voluntarily.

The attorney's job is to disbelieve you. Don't think you will convince him/her to change his mind. Don't worry about this.

EXAMPLES

Q: How did your accident happen?

BAD RESPONSE: I was walking out of the store and I wanted to get to the car so I walked down the sidewalk and didn't see anything until after I fell.

GOOD RESPONSE: I was walking down the sidewalk.

REASONING: You were not asked what you were intending to do or what you were thinking.

QUESTION: Did you miss any work due to the accident?

BAD RESPONSE: Yes, I did not go back to work for 2 weeks and lost about \$800.

GOOD RESPONSE: Yes.

REASONING: You were not asked how long you missed from work or how much income you lost. Therefore, don't volunteer this info.

QUESTION: Were you injured in the accident?

BAD RESPONSE: Yes, I hurt my head, back and neck.

GOOD RESPONSE: Yes

Get the idea? If not, we can discuss any questions you have. Please call.

Thanks Paul

----- Original Message -----

From: Paul Dulberg <pdulberg@comcast.net>

To: Hans Mast <hansmast@comcast.net>

Sent: Thu, 17 Jan 2013 18:05:39 -0000 (UTC)

Subject: Deposition

Hi Hans,

Just wanted to say its a good thing we rescheduled the deposition because I'm simply not doing well today at all after having the hemroids removed yesterday. I wouldn't have been able to make it in today at all and from what the surgeon said, I wont be able to walk or sit very well for 3 to 5 days. Let me know when you want to do another practice session but its probably best to do anytime after this weekend.

Thanks for all your help.

Paul

Paul Dulberg

847-497-4250

Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Deposition**
Date: December 28, 2016 11:13:43 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: January 17, 2013 at 12:05:39 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Deposition**

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Thanks for all your help,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: SSDI update**
Date: December 28, 2016 11:14:27 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: January 17, 2013 at 11:58:40 AM CST
To: Janet Douglass <janet@ssdatty.com>
Subject: **SSDI update**

Hi Janet,

I met with Dr. Sagerman (hand and arm surgeon) for a follow up on Monday for both my right and left arms. He scheduled another follow up in March and prescribed more physical therapy.

I mentioned a new issue I had to Dr. Sagerman, (hemroids) that I first noticed on Saturday and asked him where I should go. He sent me to Dr. Rosenova an internist. Dr. Rosenovas office had me come in the same day. Dr. Rosenova took one look and sent me to Dr. Daniel Conway a general surgeon to have it removed ASAP.

Dr. Conway took one look and surgically removed the hemroid right there on the spot. I have a follow up with Dr. Conway on February 13th.

I was told by the dr's that hemroids can happen at any age however it usually doesn't happen till after 50 years of age. One of the things that may cause it earlier that seemed to hit home with me as to the cause is stress. With everything I've been through stress makes the most sense to me. Hemroids hurt bad and it's going to take me a few days to recuperate. It hurts to walk, sit, stand, etc...

On another note, I missed my appointment at rosecrance earlier this month because I had a bad neck day and didn't get out of bed all day. I rescheduled with them and will be meeting with them again in February.

I have those forms from SSDI and am going to try and fill them out today and get them to you but i cant promise that i will get it done. The pain meds are simply kicking my butt. With everything that happened this week (hemroid issue) I don't know if I am over the 10 day demand they gave me but I am doing my best. I need to go lay down.

Thanks for everything,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical update**
Date: December 28, 2016 11:16:49 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: December 3, 2012 at 11:42:53 AM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Medical update**

Hi Hans,

I went to see Dr. Sagerman this morning for a follow up from the surgery on my right arm almost 6 months ago. He wants to see me again in 6 weeks for another follow up.

My Mom, Barb, went with me this morning to make sure I talked to him about my left arm. It has been hurting bad for 3 to 4 weeks now and she wanted me to get his advice. Dr. Sagerman had an X-ray done and said it looks good but I have what is called lateral epicondylitis or tennis elbow in my left elbow. He said it was probably just from over use due to me not using my right arm and could be treated. He said I need therapy for the left arm and prescribed 6 weeks of therapy 2 times a week and would follow up with it at the same time as my next appointment for my right arm.

I went to Fox Lake dynamic hand therapy with the prescription to schedule the appointments. They set the appointment for this Friday at 1:30 pm.

When I got home Dynamic Hand Therapy called. They said they cannot see me because this is not part of the litigation pending from my right arm unless the Dr. says it is. And because I have no insurance it would cost me \$70.00 a visit.

Which there is no way I can afford. I have no income.

Any advice?

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: SSDI update**
Date: December 28, 2016 11:17:29 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: December 3, 2012 at 11:40:57 AM CST
To: Janet Douglass <janet@ssdatty.com>
Subject: **SSDI update**

Hi Janet,

I went to see Dr. Sagerman this morning for a follow up from the surgery on my right arm almost 6 months ago. He wants to see me again in 6 weeks for another follow up.

My Mom, Barb, went with me this morning to make sure I talked to him about my left arm. It has been hurting bad for 3 to 4 weeks now and she wanted me to get his advice. Dr. Sagerman had an X-ray done and said it looks good but I have what is called lateral epicondylitis or tennis elbow in my left elbow. He said it was probably just from over use due to me not using my right arm and could be treated. He said I need therapy for the left arm and prescribed 6 weeks of therapy 2 times a week and would follow up with it at the same time as my next appointment for my right arm.

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Any advice?

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Record release form**
Date: December 28, 2016 11:19:35 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: October 27, 2012 at 9:46:11 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Record release form**

Hi Hans,

Received a letter from you to sign releasing medical and employment records.
Noticed that NW Community Hospital and Juskie Printing, one of my employers were not listed.

Should I just add them and sign or what?

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: SSDI update**
Date: December 28, 2016 11:19:08 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: October 31, 2012 at 7:54:54 AM CDT
To: Janet Douglass <janet@ssdatty.com>
Subject: **SSDI update**

Hi Janet,

I went in to rosecrance yesterday for the initial interview and met with Clair Mendenhall a mental health counselor. I am scheduled to attend a group therapy session with her on Wednesday November 14th at 12:30 pm.

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: SSDI update Paul Dulberg**
Date: December 28, 2016 11:20:36 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: October 22, 2012 at 3:00:00 PM CDT
To: Janet Douglass <janet@ssdatty.com>
Subject: **Re: SSDI update Paul Dulberg**

Yes, rosecrance. that is if I can find last years tax returns because they require it.

Paul Dulberg
847-497-4250

On Oct 22, 2012, at 1:12 PM, "Janet Douglass" <janet@ssdatty.com> wrote:

Paul --

I forgot to ask you where you are going to do the mental health therapy. Are you going to Rosecrance as Dr McMasters suggested (on the disability report) or are you going to continue to see her at the McHenry Community Clinic?

Please let us know what date you are going to start therapy and where.

Thank you.

Janet

Janet M. Douglass, Head Paralegal
M. Margaret Bradshaw P.C.
454 W. Jackson Street
Woodstock IL 60098
Ph 815-206-2908
or 877-SSD-Atty
Fx 877-773-9889
Janet@SSDAtty.com
www.SSDAtty.com

----- Original Message ----- From: "Paul Dulberg" <pdulberg@comcast.net>
To: "Janet Douglass" <janet@ssdatty.com>
Sent: Monday, October 22, 2012 11:57 AM
Subject: SSDI update

Hi Janet,

Just met with Dr. Sagerman. He suggested that I do physical therapy at home rather than go in to the clinic from this point forward. He set up an appointment to see me in 6 weeks on 12/3/2012.

I told him that I had applied for disability and he said he would fill out any paperwork needed but is still hopeful my arm will regain some strength over time. He also left me on full restrictions.

He had a suggestion for getting my neck looked at. He said to just walk into cook county hospital and have them perform the MRI then take it to a neurologist or Otho to have it read. I told him that Dr. Levin a neurologist offered assistance with my neck once my arm issue was taken care of. He said either way I should get assistance and under a Dr.'s care for it soon.

On another note, Dr. McMasters the psychiatrist suggested therapy and now that I'm not going to physical therapy every other day I'm going to go over and get assistance this week and see how it goes.

That's about it for now. Please let me know if you need anything and thanks for all your help,
Paul

Paul Dulberg
847-497-4250=

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical update**
Date: December 28, 2016 11:21:10 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: October 22, 2012 at 12:02:53 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Medical update**

Hi Hans,

I met with Dr. Sagerman today. He told me to perform physical therapy at home from this point forward. He left me on full restrictions and set up a new appointment in 6 weeks on 12/3/2012. He is hopeful my arm is going to get stronger with time.

That's about it for now if there is anything you need please let me know and thanks for all your help,
Paul

Paul Dulberg
847-497-4250