

**From:** Julia Williams juliawilliams@clintonlaw.net  
**Subject:** Re: Document requests  
**Date:** April 19, 2019 at 12:43 PM  
**To:** Paul Dulberg pdulberg@comcast.net  
**Cc:** Ed Clinton ed@clintonlaw.net, Mary Winch marywinch@clintonlaw.net

JW

We'll remove the social security numbers. We always redact birthdates, social security numbers, and account information if it is a financial account.

Best Regards,

Julia Williams  
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On Apr 19, 2019, at 6:13 AM, Paul Dulberg <[pdulberg@comcast.net](mailto:pdulberg@comcast.net)> wrote:

Morning Julia,  
One thing I'm curious about is can we remove my social security number from any documents you decide we need to turn over? I might be wrong but I don't think the documents we turn over or make public need to have my social security number.  
Thanks,  
Paul

On Apr 18, 2019, at 3:53 PM, Paul Dulberg <[pdulberg@comcast.net](mailto:pdulberg@comcast.net)> wrote:

Hi Julia,

Yes the hard files I refer to is the Baudin file

On the Medical records I wish the defense good luck getting the 2002 medical files.  
When I was collecting the medical files from the 2002 auto accident for social security disability many of the Dr's I had seen didn't keep the files that long but others did so we got enough but this is almost 8 years later, or 17 years since the accident and I suspect even fewer will have them.  
Our best bet is to get the files the attorneys already collected years ago for social security. From what I remember it had everything from the 2002 auto accident except Dr. Kohn and I saw I had something on her from the attorney who handled the auto accident back in 2002.

Ugh, I need to dig through more boxes and find that.

I did find my tax returns dating as far back as 1986 if they need those. Lol

Two more weeks is a good deal because I'm still digging through boxes and will probably be able to find more scraps of information I had saved.

If you have any problems digesting the information please feel free to ask.

Thank You,  
Paul

On Apr 18, 2019, at 3:15 PM, Julia Williams <[juliawilliams@clintonlaw.net](mailto:juliawilliams@clintonlaw.net)> wrote:

Thanks Paul.

We received a number of emails, which I am going through.

I have the Gooch files and the hard copy files that you dropped off, which I think you refer to as the Boudins file.

Don't worry about the Bankruptcy cost. We can get that at a later time or get it from the online Court file. It is rather easy to find those things out.

I did not request any medical files. Generally, Defense counsel requests files directly from the doctors so we do not expend money doing that. If we need them, then we will get them.

Given the information that you have provided, we will need more time to digest this and get it in a good format. I will work with counsel and get a two week extension to finalize discovery.

Best Regards,

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On Apr 18, 2019, at 11:14 AM, Paul Dulberg <[pdulberg@comcast.net](mailto:pdulberg@comcast.net)> wrote:

Hi Julia,  
In The previous emails, I sent a lot for you to unpack.  
It's what I have been able to find.  
The rest of the documents you should already have from Gooch and the Boudins files.

I have not heard back From David Stretch for the costs of the Bankruptcy but I believe it was \$1800 that I gave him and the trustee took the legal limit allowed for each creditor.  
I can get the exact amount I paid him but I need to get my moms bank statements. We have a joint account and it came out of that account.

Also, Mark, the owner of Juskie Printing is supposed to be getting back to me with an email confirming my income from him. He said he will do whatever you need to certify it.

Oh, again did you have any luck with Margret Bradshaw for the Medical files?  
If she doesn't have them, Meredith Marcus with Daley Disability should.  
Meredith Represented me at the Hearings with the ALJ.

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I will continue to go through my boxes and If I find any surprises I will send them.

If I missed anything or you need anything else please let me know and I will do my best to find it.

Thank You,  
Paul

