

**From:** Paul Dulberg Paul\_Dulberg@comcast.net  
**Subject:** Re: Discovery Responses  
**Date:** August 13, 2019 at 9:29 AM  
**To:** The Clinton Law Firm juliawilliams@clintonlaw.net  
**Cc:** Mary Winch marywinch@clintonlaw.net, Ed Clinton ed@clintonlaw.net

PD

Hi Julia,  
I only meant that they are generally true because much is still being investigated and as we learn more through discovery the whole truth will hopefully show itself.  
Everything we answered is true.  
There is one answer that bothered me a bit, off the top of my head I don't remember which interrogatory it was from, but It had to do with damages by Mast and or Popovich and I believe the costs associated with the bankruptcy should be attributed to Mast's actions. Had I known the truthful values of the insurance and the truth about the McGuire liability I wouldn't have felt I needed to file bankruptcy, ruin my credit and put my home on the line.  
May we add that the damages are still under investigation?  
Hope that clarifies my thoughts when I used the term generally.  
Thanks,  
Paul

On Aug 13, 2019, at 8:59 AM, Julia Williams <juliawilliams@clintonlaw.net> wrote:

Dear Paul,

When you say "generally", what does that mean? What portions are not "true and accurate"?

We cannot have "generally" true answers. We are stuck with these answers. The other side will question you about them in your deposition and then if something is inaccurate they will use it against you at trial.

Please review and advise as to what is incorrect and needs to be corrected.

Best Regards,

Julia Williams  
Of Counsel  
The Clinton Law Firm  
111 W. Washington, Ste. 1437  
Chicago, IL 60602  
P: 312.357.1515  
F: 312.201.0737  
[juliawilliams@clintonlaw.net](mailto:juliawilliams@clintonlaw.net)

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On Aug 12, 2019, at 2:02 PM, Paul Dulberg <Paul\_Dulberg@comcast.net> wrote:

Hi Mary, Ed, Julia,

The three documents you sent are generally true and accurate.

Thank You,  
Paul

On Aug 12, 2019, at 11:07 AM, Mary Winch <marywinch@clintonlaw.net> wrote:

Mr. Dulberg

Provided are the three documents with the edits you suggested. Please review them to be sure they are accurate and correct and we will proceed to send them to opposing counsel.

Mary Winch  
Legal Assistant

Mary Winch

Mary Winch  
Legal Assistant  
The Clinton Law Firm LLC  
111 W Washington Street  
Suite 1437  
Chicago, IL 60602  
312.357.1515

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**From:** "juliawilliams@clintonlaw.net" <juliawilliams@clintonlaw.net>  
**Date:** Friday, August 9, 2019 at 3:33 PM  
**To:** Paul Dulberg <Paul\_Dulberg@comcast.net>  
**Cc:** "ed@clintonlaw.net" <ed@clintonlaw.net>, "marywinch@clintonlaw.net" <marywinch@clintonlaw.net>  
**Subject:** Re: Discovery Responses

We received it. Thanks Paul. You should get an email from either myself or Mary shortly—in the next couple of business days—with the new drafts.

Thanks,

Julia Williams  
Of Counsel  
The Clinton Law Firm  
111 W. Washington, Ste. 1437  
Chicago, IL 60602  
P: 312.357.1515  
F: 312.201.0737  
[juliawilliams@clintonlaw.net](mailto:juliawilliams@clintonlaw.net)

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On Aug 9, 2019, at 11:51 AM, Paul Dulberg <Paul\_Dulberg@comcast.net> wrote:

Hi Julia,  
Please confirm you received the email below sent on August 2nd.  
Thanks,  
Paul

On Aug 2, 2019, at 4:00 PM, Paul Dulberg  
<[Paul\\_Dulberg@comcast.net](mailto:Paul_Dulberg@comcast.net)> wrote:

Hi Julia,

Dulberg RTP Responses 2019 July 31.docx is good to go.

Please find the following suggestions for changes and submit:

In, Dulberg Answers to Thomas Popovich Expert Interrogatories  
Draft 2019 July 31.docx

Please remove the following yellow highlighted text from C.

**Retained Expert Witnesses** and submit to defense, it's good to go.

We will disclose Dr. Lanford at a later date. We need to retain him again.

In, Dulberg's Answers to Hans Mast's Interrogatories to Plaintiff  
2019 July 2.docx please consider the following suggestions for  
changes and submit to the defense, it's good to go.

In the answer to Question 2 below, the strike through words may  
be replaced by the italicized word next to it.

Between October 2013 and January 2014, Mast ~~advised~~ *told*  
Dulberg that Illinois law does not permit a recovery against  
the McGuires' in the circumstances of Dulberg's case and that  
he would not receive any recovery from the McGuires. Mast  
~~advised~~ *told* Dulberg that the judge would rule in favor of the  
McGuires on a motion for summary judgment.

Mast further ~~advised~~ *told* ~~that~~ *that* Dulberg *that he* would retain his  
claim against Gaganon and be able to seek and receive a full  
recovery from Gagnon.

In, Dulberg's Answers to Popovich Interrogatories to Plaintiff 2019  
July 31.docx please consider the following suggestions for changes  
and submit to the defense, it's good to go.

In answer 2. Consider removing "and the injury sustained" from  
the following lines. I don't want to invite opinions or give the  
impression that the McGuires or Gagnon have anything of value  
to give here that the treating Dr's do not. Again, I stike out the  
words below that I think should be removed.

William McGuire ("William") has knowledoe regarding the

William McGuire ( "William" ) has knowledge regarding the facts and circumstances leading to Dulberg's injury ~~and the injury sustained.~~

Caroline McGuire ( "Caroline" ) has knowledge regarding the facts and circumstances leading to Dulberg's injury ~~and the injury sustained.~~

David Gagnon ( "Gagnon" ) has knowledge regarding the facts and circumstances leading to Dulberg's injury ~~and the injury sustained.~~

Also, in answer 2, below I strike out a typo and replace it with italic

Barbara Dulberg. 4606 Hayden Ct., McHenry, IL 60051.  
Retired. Barbara is expected to testify to the facts and circumstances of the November 4, 2013 meeting with Hans Mast. Barbara is also expected to testify as to the facts and circumstances of Paul Dulberg's pain and suffering, and ~~Dulberg's~~ *Dulberg's* loss of use of his arm.

In question 14, answer 2. below I add in italics the correct wording needed to make this accurate.

4. Enlarged Prostate Treaters:

*Dr. Berger, The Uro Center, Lake Zurich, Illinois*

Dr. Elterman and Dr. Tarnauskas, *Elterman Center, Skokie, Illinois*

In question 24 answer, please remove The following part of the highlighted text "This has been added because on January 29, 2014, you actually did agree to settle and signed the agreement. It is added because otherwise it looks like you never agreed to settle at all, which isn't true—and will be easily shown to be false through the documents. We need to be clear that the although you never granted authority to settle, you did accept a settlement."

Also, please remove just the yellow highlight from "On or around January 29, 2014, Dulberg signed the settlement agreement." and leave the text.

In the answer to Question 26 below, the striked through words may be replaced by the italicized word next to it.  
Mast ~~advised~~ *told* Dulberg that the judge would rule in favor

of the McGuires on a motion for summary judgment.

All our answers to the interrogatories are generally true so the above changes are suggestions that I believe should be made. I leave it up to you to decide whether or not to implement them.

Please provide me a copy of the final answers you submit to defense council.

Thank you,  
Paul

On Aug 2, 2019, at 9:34 AM, Julia Williams  
<[juliawilliams@clintonlaw.net](mailto:juliawilliams@clintonlaw.net)> wrote:

Dear Paul,

The appropriate files are attached here. Let me know if there are any issues. s

Best Regards,

Julia Williams  
Of Counsel  
The Clinton Law Firm  
111 W. Washington, Ste. 1437  
Chicago, IL 60602  
P:312.357.1515  
F: 312.201.0737  
[juliawilliams@clintonlaw.net](mailto:juliawilliams@clintonlaw.net)

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On Jul 31, 2019, at 6:02 PM, Paul  
Dulberg <[Paul\\_Dulberg@comcast.net](mailto:Paul_Dulberg@comcast.net)>  
wrote:

Hi Julia,  
I see two documents are the same.  
Answers to Popovich interrogatories  
with 2 different dates on the end of the  
file name.  
We are missing answers to Mast  
interrogatories.  
Thanks,  
Paul

On Jul 31, 2019, at 2:44  
PM, Julia Williams  
<[juliawilliams@clintonlaw.net](mailto:juliawilliams@clintonlaw.net)> wrote:

Dear Paul,

I have attached the most  
recent draft of the  
discovery responses.

I made some minor edits  
from your last notes. I did  
not incorporate all of your  
notes as, at this point, we  
should rely mostly on our  
own information and then  
supplement with things  
from counsel's production  
at a later date. It is simply  
too intensive to go through  
their entire production  
and incorporate in our  
initial responses.

We can supplement and I  
intend that we will  
supplement these  
responses.

At this stage, we are very  
late. If the answers are  
true and correct, I think  
we should move forward.

Please review and let me

know if we can send these  
to opposing counsel.

Best Regards,

Julia Williams  
Of Counsel  
The Clinton Law Firm  
111 W. Washington, Ste. 1437  
Chicago, IL 60602  
P:312.357.1515  
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[juliawilliams@clintonlaw.net](mailto:juliawilliams@clintonlaw.net)

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<Dulberg RTP Resposes  
2019 July 31.docx>  
<Dulberg's Answers to  
Popovich Interrogatories  
to Plaintiff 2019 July  
31.docx><Dulberg  
Answers to Thomas  
Popovich Expert  
Interrogatories Draft 2019  
July 31.docx><Dulberg's  
Answers to Popovich  
Interrogatories to Plaintiff  
2019 July 29.docx>

<Dulberg's Answers to Hans Mast's Interrogatories to  
Plaintiff 2019 July 2.docx><Dulberg RTP Resposes  
2019 July 31.docx><Dulberg's Answers to Popovich  
Interrogatories to Plaintiff 2019 July 31.docx>  
<Dulberg Answers to Thomas Popovich Expert  
Interrogatories Draft 2019 July 31.docx>

| | Expert Interrogatories 2019 August 12 with EDITS to client .docx>

<Dulberg Answers to Thomas Popovich Expert Interrogatories 2019 August 12 with EDITS to client .docx><Dulberg Dulberg's  
Answers to Popovich Interrogatories to Plaintiff 2019 August 11 EDITS to Client.docx><Dulberg's Answers to Hans Mast's  
Interrogatories to Plaintiff 2019 August 11 with EDITS to client.docx>



