

**From:** Paul Dulberg Paul\_Dulberg@comcast.net  
**Subject:** Re: Dulberg v Popovich et al; Deposition dates?  
**Date:** January 23, 2020 at 12:42 PM  
**To:** Julia C. Williams jwilliams@williamslawchicago.com  
**Cc:** Ed Clinton ed@clintonlaw.net, Mary Winch marywinch@clintonlaw.net

PD

Hi Julia,

I am available both dates however, I have 4 major concerns before locking in a date:

1. Why depose me a week before Mast and give Mast the opportunity to read my deposition and formulate a strategy before he is questioned?  
It would seem to be more fair to both parties to do both depositions on the same day to get at the truth.
2. I would like to meet with you and Ed at least one week prior to Mast's deposition and discuss the series of questions that I sent you last July designed to trap Mast into telling the truth or perjuring himself.
3. I would prefer to find out what was redacted in the 100+ pages of blacked out documents the defense turned over during the document disclosure so we can improve our strategy and hone our questions.
4. Do you or does the defense plan to call anyone else to be deposed?

Thanks,  
Paul

On Jan 22, 2020, at 4:26 PM, Julia C. Williams <jwilliams@williamslawchicago.com> wrote:

Dear Paul,

We continue to work on discovery with opposing counsel.

As we are moving through the written discovery, we are trying to get an idea of availability for depositions.

Are you available to have your deposition taken on Feb. 12? Can you get downtown to opposing counsel's office at 150 S Wacker?

Also, we are looking at taking Hans Mast deposition on either Feb. 19 or Feb. 20. The location has yet to be determined. I would prefer to take it at my office, but we may take it in McHenry county, but we are looking for office space to do that.

If you wish to attend Mr. Mast deposition, are you available on Feb. 19 or 20?

Best Regards,

Julia C. Williams  
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