


**From:** Paul Dulberg pdulberg@comcast.net   
**Subject:** Re: Dulberg v Mast et al; Discovery and Court Order  
**Date:** February 3, 2020 at 2:17 PM  
**To:** Julia C. Williams jwilliams@williamslawchicago.com  
**Cc:** Mary Winch marywinch@clintonlaw.net, ed@clintonlaw.net

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PD

Hi Julia,

I need to address this one first.

I went to Mr. Popovich's office today to review the file. The blank black pages that appear to be redacted are not redacted pages. The firm sent the file out to a copy service who inserted red sheets of paper between the different documents to ensure that scanning and copying occurs correctly. I counted the pages and reviewed them—it matches up and makes sense. They did not redact any part of their file.

1. Was the copy service Minuteman press located right next door to the Popovich firm?

2. I've been in printing and graphic design since 1986 and have used all sorts of copy machines over the years and I have never heard of inserting red paper at random intervals to ensure the scanning or copying occurs correctly. Have you ever run across a Xerox machine or any other copy machine that needed this?

To ensure that scanning or copying is done correctly one usually calibrates the machine prior to operation. Certainly not with red paper at random intervals during the job but with special calibration images used to calibrate the white and black points along with the levels of grey with some sort of greyscale. These special calibration images are unique by manufacturer and model of the machine and come with instructions on how to use them properly. There is also color calibration which is also done prior to using the machine for a job. There is also linearization, ex. this ensures that 1 inch actually equals 1 inch along both axis and is also done prior. In all honesty, calibrations are usually never performed by the average user. In copy shops they typically performed at the beginning of the day. In high end graphic studios they're performed before running each job. For something that's low end black and white such as the popovich job it is unlikely any calibrations were done at all.

I don't buy their excuse just because the amount of pages match up with the case file.

Did the case file have the malpractice insurance declaration pages?

Did the case file have internal organizational memos in it?

Did the case file have emails in it?

Why didn't Balke or the Baudins see everything that was, or is in the case file when Mast turned it over?

LoI, I can go on and on on this one

Please give any copy service other than the one the Popovich firm used a call and ask if using red paper on a black and white job without grayscale is a standard operation procedure for anything before saying it makes sense and buying the BS they gave you.

Oh, what happened to the file divider excuse?

Thanks,  
Paul

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On Feb 3, 2020, at 12:54 PM, Julia C. Williams <jwilliams@williamslawchicago.com> wrote:

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