

From: Paul Dulberg Paul_Dulberg@comcast.net
Subject: Re: Mast deposition
Date: June 22, 2020 at 3:26 PM
To: The Clinton Law Firm juliawilliams@clintonlaw.net
Cc: Ed Clinton ed@clintonlaw.net, Mary Winch marywinch@clintonlaw.net

PD

Hi Julia,

It appears that exhibit 6 and 7 are identical that I downloaded from the links provided.
I think it is exhibit 7 that is missing

Paul

On Jun 22, 2020, at 1:45 PM, Julia Williams <juliawilliams@clintonlaw.net> wrote:

Dear Ed and Paul,

I have attached an outline of the questioning and the exhibits we will use for the deposition—this is an ongoing work product and will serve as our source of discussion tomorrow.

Please note that all of the questions listed and the exhibits listed may NOT be used in the deposition. It is simply an outline of topics/etc that I intend to cover. Depending on Mast's answers, things may change. It is my intention to focus on the work around the McGuire claim. As Paul was able to go to arbitration and recover on the Gagnon claim, there is not a question of Gagnon's liability. The damages do not stem from the claim regarding Gagnon as that claim was won at arbitration. The crux of the claim is that the McGuires would have been found liable for failing to supervise Gagnon and thus would have been required to pay, jointly and severally, for the damages.

Here is the information to call in tomorrow:

Dulberg Case Mast Deposition Preparation Call

Tue, Jun 23, 2020 2:00 PM - 2:30 PM (CDT)

You dial in using your phone.

United States: +1 (872) 240-3311

Access Code: 468-503-221

Best Regards,

Julia Williams
Of Counsel
The Clinton Law Firm
111 W. Washington, Ste. 1437
Chicago, IL 60602
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juliawilliams@clintonlaw.net

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On Jun 18, 2020, at 9:24 AM, Paul Dulberg <Paul_Dulberg@comcast.net> wrote:

Hi Julia,

Please find the attached evidence_list.txt and questions_for_mast.txt that we wish to discuss with you next week before Masts deposition.

Thank you and stay safe,
Paul

<evidence_list.txt><questions_for_mast.txt>