

From: Paul Dulberg pdulberg@comcast.net
Subject: Re: Mast dep
Date: June 25, 2020 at 2:07 PM
To: The Clinton Law Firm juliawilliams@clintonlaw.net
Cc: Ed Clinton ed@clintonlaw.net

PD

I would also like to see any proof that the McGuire's attorney drafted or filed a motion for summary judgment

Would this require subpoenaing and possibly deposing McGuire's attorney to see if there was any actual intent or threat of filing such a motion and what grounds they were using to threaten to file the motion?

Paul

On Jun 25, 2020, at 1:56 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

Is it possible to subpoena the phone records of Mast, the law office of Tom Popovich and myself from the phone companies?

I want to show there was no communication between us just prior to the October 22 \$7500 offer.
I don't believe there was any communication for a few weeks prior to that offer

Paul

On Jun 25, 2020, at 1:40 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

May I introduce a few cases in my past where I did actually testify in front of a judge and was found to be very credible?

It would take a trip to the county clerk's office and a bit of digging to find the auto accident cases and other stuff

I was not deposed in those cases but I did testify in court

Paul

On Jun 25, 2020, at 1:32 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

Why didn't we dig into what Mast believes makes a good witness?
He opened the door as an expert when he put me on a scale of 1 to 10

I want Mast in front of a jury. And I want an expert to testify

Ok I need to cool down

Thank you for today
Paul

On Jun 25, 2020, at 1:07 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

Why is there no actual contact between the supposed independent contractor (Gagnon) and the homeowner/chainsaw owner/ (McGuire's)?

You cannot claim someone is an independent contractor after the fact unless there is some proof he was an independent contractor before the fact

Since when do independent contractors bring no tools of their own and only use the tools of the person who contracted them? Assuming there is a contract

The only tool Gagnon provided was his own body as labor for the McGuire's, that's what employees bring to the job, not independent contractors

Ok I can go on and on here

I will wait to hear from you and get the transcripts

Paul

