

From: Julia Williams juliawilliams@clintonlaw.net
Subject: Re: Mast dep
Date: June 25, 2020 at 4:02 PM
To: Paul Dulberg pdulberg@comcast.net
Cc: Ed Clinton ed@clintonlaw.net, Mary Winch marywinch@clintonlaw.net

JW

Dear Paul,

Thank you for your feedback related to the deposition today. As most of your questions appear to be rhetorical, I am not actually going to address each one, instead, I will reiterate what we discussed. If you do have specific action items/items of discussion, please compile them in a single email and we can set up a time to discuss them.

As I stated in our phone call after, Mast was not testifying as to any independent recollection of the events. He stated several times that he did not recall the individual conversations and testified very generally about the advice provided throughout the representation. He stated that he did not independently recall any of the documents presented—only that he recognized his signature and that he did either create them or cause them to be created. Meaning that he was not disputing the authenticity of the document or email, but could not expound on it. Essentially, we have the documents, but very little first hand testimony from Mast about the case.

Again, I will regroup with Ed Clinton, Jr. and we will reach out with next steps.

Best Regards,

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On Jun 25, 2020, at 2:27 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

Why did mast feel it was appropriate to not send me the depositions as soon as he got them?

Every attorney I had since including yourself sends me the depositions as soon as they are available

I actually had to ask for the depositions 3/4 of a year after they were taken because Mast wanted me to make settlement decisions before knowing what the other parties testified to

What kind of attorney doesn't want their client to see what the other side or his own dr's testified to before making decisions?

A bad attorney is my answer

On Jun 25, 2020, at 2:21 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

Also, Mast seemed to hang a lot on one dr whom only seen me twice for less than 10 minutes each visit and was not specialized in dystonia while ignoring the testimonies of 2 dr's who specialize in the area and 2 more dr's who actually performed the surgeries

I want to know why he would take the word of one unfavorable dr over 4 favorable treating dr's who specialized in what they testified about

On Jun 25, 2020, at 2:07 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

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

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?

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 clerks 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
Pau;l

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

