


**From:** Julia Williams [juliawilliams@clintonlaw.net](mailto:juliawilliams@clintonlaw.net)   
**Subject:** Fwd: Settlement Demand--Dulberg v Mast  
**Date:** July 30, 2020 at 9:06 AM  
**To:** Paul Dulberg [pdulberg@comcast.net](mailto:pdulberg@comcast.net)

JW

Dear Paul,

Per your email request, here is the demand sent to Mr. Flynn. We did not receive a formal response, other than it was passed along to the client as you see below. I did discuss the demand with Mr. Flynn. He indicated that his client would not accept such a large demand. He indicated that his client would be more inclined to accept a smaller demand, more in the \$10,000-\$20,000 range, but did not give a specific number and did not make any formal counter-offer.

Best Regards,

Julia Williams  
Of Counsel  
The Clinton Law Firm  
111 W. Washington, Ste. 1437  
Chicago, IL 60602  
P: 312.357.1515  
F: 312.201.0737  
[juliawilliams@clintonlaw.net](mailto:juliawilliams@clintonlaw.net)

This message may be privileged and confidential. If you are not the intended recipient, please delete the email and notify the sender immediately.

Begin forwarded message:

**From:** George Flynn <[gflynn@karballaw.com](mailto:gflynn@karballaw.com)>  
**Subject:** RE: Settlement Demand--Dulberg v Mast  
**Date:** March 6, 2020 at 2:21:38 PM CST  
**To:** Julia Williams <[juliawilliams@clintonlaw.net](mailto:juliawilliams@clintonlaw.net)>

Julia:

Thank you. I am duty bound to pass along this demand, and I have done so.

Have a nice weekend.

**George Flynn**

**Karbal | Cohen | Economou | Silk | Dunne | LLC**  
150 S. Wacker Drive  
Suite 1700  
Chicago, IL 60606  
 P: (312) 431-3622  
 F: (312) 431-3670  
 E: [gflynn@karballaw.com](mailto:gflynn@karballaw.com)

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-----Original Message-----

From: Julia Williams <[juliawilliams@clintonlaw.net](mailto:juliawilliams@clintonlaw.net)>  
Sent: Friday, March 6, 2020 2:10 PM  
To: George Flynn <[gflynn@karballaw.com](mailto:gflynn@karballaw.com)>  
Cc: Ed Clinton <[ed@clintonlaw.net](mailto:ed@clintonlaw.net)>; Mary Winch <[marywinch@clintonlaw.net](mailto:marywinch@clintonlaw.net)>  
Subject: Settlement Demand--Dulberg v Mast

FOR SETTLEMENT PURPOSES ONLY

Dear George,

Our client has authorized us to make a demand in this matter. He would be willing to settle for a payment of \$350,000 to him.

Best Regards,

Julia Williams  
Of Counsel  
The Clinton Law Firm  
111 W. Washington, Ste. 1437  
Chicago, IL 60602  
P:312.357.1515  
F: 312.201.0737  
[juliawilliams@clintonlaw.net](mailto:juliawilliams@clintonlaw.net)

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