From: **Paul Dulberg** pdulberg@comcast.net
Subject: Re: PAUL DULBERG v. THE LAW OFFICES OF THOMAS J. POPOVICH, P.C, et al. (Circuit Court of McHenry County, IL No. No. 17 LA 377)
Date: July 30, 2020 at 1:50 PM
To: The Clinton Law Firm juliawilliams@clintonlaw.net
Cc: Mary Winch marywinch@clintonlaw.net, Ed Clinton ed@clintonlaw.net

PD

Hi Julia,

Thank you for getting this extended.

I'm pulling from memory here because I had a a Dr's appointment today and am away from my desk

I just took your July 2 email and reviewed it.

I didn't collect the documents because I thought I had already turned over all the gooch files and emails to you and I thought we waived privilege for Boudin and you have all of that as well.

I suppose other than the last request asking for "documents" relating to a conversation between Baudin and myself when we were leaving the ADR the rest of this would be contingent on Judge Meyers decision of the objections over Gooch questioning that were raised during my deposition.

I'm still not sure how I'm supposed to have documents from a verbal conversation with Baudin.

I will look at all this again when I get home.

Thanks again,
Paul

> On Jul 30, 2020, at 10:21 AM, Julia WIlliams <juliawilliams@clintonlaw.net> wrote:
>
> Dear Paul,
>
> These document requests are due today. We have obtained a 28 day extension so the responses are now due August 27, 2020. We anticipate filing our motion to withdraw. Thus, you will need your new counsel to respond or prepare your own response.
>
> 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
>
> This message may be privileged and confidential. If you are not the intended recipient, please delete the email and notify the sender immediately.
>
> > On Jul 2, 2020, at 12:10 PM, Julia WIlliams <juliawilliams@clintonlaw.net> wrote:
> >
> > Dear Paul,
> >
> > Opposing Counsel has tendered a supplemental request for production. Please review. A response is due by July 30, 2020.
> >
> > You can begin gathering responsive documents.
> >
> > Some of the document may be subject to attorney-client privilege.
> >
> > 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

juliawilliams@clintonlaw.net

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Begin forwarded message:

From: Linda Walters <lwalters@KARBALLAW.com>
Subject: PAUL DULBERG v. THE LAW OFFICES OF THOMAS J. POPOVICH, P.C, et al. (Circuit Court of McHenry County, IL No. No. 17 LA 377)
Date: July 2, 2020 at 11:11:39 AM CDT
To: "ed@clintonlaw.net" <ed@clintonlaw.net>, "juliawilliams@clintonlaw.net" <juliawilliams@clintonlaw.net>, "Marywinch@clintonlaw.net" <Marywinch@clintonlaw.net>
Cc: George Flynn <gflynn@karballaw.com>

On behalf of George Flynn, please see the attached:

- Supplemental Request for Production to Plaintiff; and
- Notice of Service of Discovery Document – Supp. RFP to Plaintiff

Thank you.

Linda Walters

Karbal | Cohen | Economou | Silk | Dunne | LLC
150 S. Wacker Drive
Suite 1700
Chicago, IL 60606

<phone_3aef1e25-ed01-4e86-9c05-55877d93199b.jpg>

P: (312) 431-3641

<fax_b47779bc-2f12-4a09-9ce3-87f4947c34ef.png>

F: (312) 431-3670

<envelope_5540fafc-2f13-4c5f-af64-a2c20113037b.png>

E: lwalters@KARBALLAW.com

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<2691756v1 - Supplemental Request for Prod. to Plaintiff.PDF>
<2691837v1 - Notice of Service of Discovery Documents -- Supplemental RTP to Plaintiff (FS).PDF>