

From: Julia Williams juliawilliams@clintonlaw.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 2:26 PM
To: Paul Dulberg pdulberg@comcast.net
Cc: Mary Winch marywinch@clintonlaw.net, Ed Clinton ed@clintonlaw.net

JW

Dear Paul,

Attorney-Client Privilege:

We waived attorney-client privilege as to the underlying case, meaning the original case that you filed against the McGuire and Gagnon. I did not waive any attorney client privilege as to the current case against Thomas Popovich firm and Mast—17 LA 377—which would be between you and Attorney Gooch/his firm or you and our firm. I maintained an objection in the deposition as to any communications between you and Attorney Gooch.

I did provide Attorney Gooch's retainer contract in the last set of documents as I do not believe that is actually privileged. It is not intended to provide advice or confer confidential information.

Communication with Gooch:

I did not receive from you or Attorney Gooch any emails or communication between you and Mr. Gooch. I received Attorney Gooch's file, but his file did not include any communication between him and you.

I did receive from you and Attorney Gooch emails and communications between you and your counsel in the underlying case, which was produced with the documents.

You are only required to produce documents in your possession or control, so if you didn't take notes on a conversation then there would be no documents.

You have received all of the discovery that we produced on your behalf to the other side.

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

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On Jul 30, 2020, at 1:50 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

Hi Julia,

Thank you for getting this extended.

I'm pulling from memory here because I had 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
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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
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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: 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

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

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

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| 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>