


**From:** George Flynn gflynn@karballaw.com   
**Subject:** Re: Dulberg  
**Date:** June 4, 2020 at 12:09 PM  
**To:** Julia Williams juliawilliams@clintonlaw.net  
**Cc:** Linda Walters lwalters@KARBALLAW.com, Mary Winch marywinch@clintonlaw.net, Ed Clinton ed@clintonlaw.net

GF

Thanks Julia. I agree on all of your points.

I will make a determination after Hans' dep about whether to take any other f 1's.

Talk to you tomorrow.

## George Flynn

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On Jun 4, 2020, at 12:06 PM, Julia Williams <juliawilliams@clintonlaw.net> wrote:

Hi George,

Here is the notice of deposition. It looks like all the agencies are set up to have the reporter there with you or remotely, so it is just a matter of minor logistics. More to come on that.

For Friday:  
f(1) and f(2):

1. We have a firm date for Hans Mast deposition.
2. That after that deposition, Plaintiff will determine whether he wants to take Thomas Popovich's deposition or a representative of the Popovich firm (I can only imagine that it would be Thomas Popovich). I don't believe that there will be any other depositions from our side, but I would like f(1) and f(2)s to stay open through the summer.
3. Let me know if you think you'll have any more folks you want to depose.

Written Matters:

There is some outstanding updated written discovery that you requested and needs to be addressed after Plaintiff's deposition. It was put on the back burner due to the COVID crisis. But I will get on top of that. If there are any issues, we can address them before the next court date.

Next Date:

Early August? Early September? We should be ready to close f(1) and f(2) at that point.

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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On Jun 4, 2020, at 11:57 AM, George Flynn <[gflynn@karballaw.com](mailto:gflynn@karballaw.com)> wrote:

Julia:

Any thoughts on what we want to tell the Judge on Friday?

**George Flynn**

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On Jun 3, 2020, at 9:32 AM, George Flynn <[gflynn@karballaw.com](mailto:gflynn@karballaw.com)> wrote:

Julia:

June 25 at 10:00 for the Mast dep works.

Take care

**George Flynn**

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<Dulberg Mast Notice of Deposition 2020 June 2.pdf>

