

From: Paul Dulberg Paul_Dulberg@comcast.net
Subject: Fwd: Forward to Julia
Date: July 8, 2019 at 11:06 AM
To: Julia Williams juliawilliams@clintonlaw.net
Cc: ed Clinton ed@clintonlaw.net

PD

Hi Julia,
You Have my permission to talk with Tom Kost (My Brother) about this.
Thank You,
Paul

Begin forwarded message:

From: T Kost <tkost999@gmail.com>
Subject: Forward to Julia
Date: July 7, 2019 at 7:48:33 PM CDT
To: Paul_Dulberg@comcast.net

Paul, please forward this email to Julia.

Julia, please look at the information in the attached folder.

After examining all the documents in the Dulberg disclosure file and the Popovich disclosure file very carefully, Paul and I have discovered a number of things that are very useful for us to know.

Please read the "READ_ME" file in the folder first. That will guide you through the rest of the information.

After you feel that you are familiar with the contents of the folder, I think that you and I should talk about it by phone.

You can contact Paul through email to set up a time for a phone conversation between us when you are ready.

Thanks,

Tom Kost (Paul's brother)

 **To_Julia.zip**

Hello Julia,

What follows is a rough outline of the information included in this folder.

This is how I will reference documents:

We have 2 batches of file disclosures, one from us and one from the opposing counsel:

Dulberg Document Disclosure I will abbreviate as (ddd)

Popovich Document Disclosure I will abbreviate as (pop)

If I am referencing page 289 of the Popovich document disclosures, I will abbreviate as (pop 289).

The opposing counsel has released one "smoking gun" document that we've never seen before. It is (pop 192). Paul never gave Mast authorization to make this offer. We have ample evidence that Paul never authorized the offer made in (pop 192) and he knew nothing about it until seeing it last week. Note that it is not in the box of files we gave to you. It is not in the box of files that Mast gave to Paul when Mast withdrew from counsel. Also, the Baudin law firm and the Gooch law firm never saw this document.

In this folder I include the following files:

missing_files.txt

This gives a list of documents that I spotted as missing from (ddd) and (pop). The list is not complete but these missing files are important and the opposing counsel should be compelled to produce them or describe in detail why they can't.

Some files are missing from (ddd) because they were not given to Paul by Mast when he withdrew counsel, so they were never given to the Baudin law firm and therefore never made it to the Clinton law firm.

I explain why I know they are missing when it is not obvious in the file.

timeline_of_mcguire_settlement.txt

This gives you a rough timeline of events leading to Paul accepting a \$5,000 settlement from the McGuires. Since we were never able to see (pop 192) until now, we never understood the details of how Mast tricked Paul into such a small settlement. The fact that Mast initiated the settlement process through (pop 192) without Paul's knowledge or permission is proof that this case is about more than Mast's negligence. It is about willful intent or malicious intent to deceive his client.

Of course you will need convincing proof that (pop 192) was initiated without Paul's knowledge. We have that proof. As I fill in the timeline more and more, the evidence will be stronger and stronger.

questions_for_mast.txt

Here I put together a series of questions that are crafted to pin Mast down in such a way that he must explain what he did. He should be compelled to explain why he did what he did.

The questions, of course, are just a guide. We have no desire to tell you how to do your job. You will know how to phrase questions better than us. But no matter how the questions are phrased, the points addressed in these questions are important. It would be nice to see Mast be compelled to address some of them for the first time in 6 years.

REFERENCE INFORMATION

ddd_table_of_contents.txt

(ddd) consists of close to 1500 pages. I made this table of contents to help Paul and me find certain documents easily within the mound of files. If it helps you, good. If not just ignore it.

pop_table_of_contents.txt

This helps us find our way around close to 2500 pages of documents. For you if you want it.

Folder: Lawyers Emails by date

The emails in (pop) and (ddd) can be a real headache to look through. This folder helps Paul and me see the streams of email exchanges as they happen month by month. We find it useful. It is yours if you want it. If not, please ignore.

Within these files I reference emails by using this folder and using the form (email: folder_name, file_name).

For example, the reference (email: 2013 10, Mast2-219) should be easy to find in folder 2013 10. This folder contains emails from October, 2013 and each email stream is given a separate name.

Thanks. We will make it our business to know these files and documents intimately. Please let us know if we can help you locate something, explain anything, or dig up any evidence. As you can see in the case of (pop 192), locating and understanding the context of a single document can make a huge difference. It seems obvious to me that Mast tried to hide documents. The Popovich law firm is still hiding the Gagnon interrogatory answers and the documents they requested from Gagnon and the McGuires.

If there is anything we can do to help, just ask.

Dulberg Document Disclosures (ddd) – Clinton submitted to Flynn –
Table of contents

3	Kajawa follow-up comments on deposition. Claim of permanent disability as the result of chainsaw accident	April 6, 2016
11	Gagnon insurance policy pulled by Baudin.	Sent Feb 15, 2016
124	McGuire amended answer	
151	McGuire's answers to Mast request to produce – requests certified copy of insurance policy. Barch answer: "Requested. Will be produced upon receipt."	Served on Mast Aug 6, 2012.
162	Barch answer to Mast interrogatories. McGuire's insurance info and limits included.	Served on Mast Aug 6, 2012
172	Gagnon answer to McGuire's interrogatories. Gagnon lies about why Paul came to McGuire property.	
191	Baudin appearance	Nov 6, 2015
198	Binding mediation agreement (rules).	mediation set for Dec 8, 2016
204	case law given to Dulberg by Mast	on Nov 20, 2013?
234	chainsaw manual	
301	more case law from mast	to Dulberg?
306	original dulberg complaint	filed May 15, 2012
313	notice to produce, Gagnon	to McGuire's
317	notice to produce, Gagnon	to Dulberg
321	cross-claim contribution, McGuire's	to Gagnon
328	Lanford resume	
343	Craig Phillips resume	
367	Karen Levin resume	
376	Apiwat Ford deposition	
413	Marcus Talerico deposition	

435 Carolyn McGuire deposition

544 Gagnon deposition

759 Note: exhibit to gagnon depo is missing stick man drawing

762 gagnon answers to interrogatories from McGuires. He lies about Dulberg's reason for being on the property

768 Karen Levin deposition

831 Kathy Kajawa deposition

890 Michael McArtor deposition

952 Dulberg deposition

1025 William McGuire deposition

1095 Scott Sagerman deposition

1161 chainsaw manual

1217 Tom Kost's notes from Nov 20, 2013 meeting

1218 Lanford opinion of responsibility

1221 release agreement from allstate after arbitration decision.
Dec 14, 2016

1239 emails begin

1260 recorded statement from Gagnon over phone

1264 Mast letter to bankruptcy atty on estimated recovery

1268 bankruptcy atty to mast

1290 more emails

1304 2 good pictures of scarred arm

1617 examination comments by independent doctor craig phillips.
October 4, 2016

1643 Barch interrogatories to Dulberg. QuesTion 16 asks DULberg why he came to McGuire's property. Also question 21

1655 Perry's answers to McGuires notice to produce

1658 Allstate to baudin letter disagreeing with kelly's assertion that policy limits are 20% higher than stated

1660 Mast answer to barch notice to produce

1666 A different Lanford finding addressed to Baudin, dated Feb 6, 2016

1669 bankruptcy atty to mast

1671 First bankruptcy trustee letter to mast? Dated Jan 6, 2015. Bankruptcy filed Nov 26, 2014

1688 motion to vacate protective order

1719 "bob" to Mast on sagerman

1735 motion to bar further opinion of dr kajawa. June 6, 2016

1820 more emails

1850 McGuires answers to gagnon interrogatories

1883 Bankruptcy trustee motion for authority to enter int binding mediation

1886 list of orders

1913 order granted for bankruptcy trustee to have authority to enter into binding mediation (ordered by bankruptcy atty)

1914 absolutely unreadable order from judge

1971 dulberg answers to (McGuires?) interrogatories.

1980 Dulberg interrogatories for McGuires

1991 Dulberg request for production from McGuires. No answers, service date included.

1999 Gooch interrogatories to Popovich law firm

2007 Gooch request for production of documents

2089 Dulberg proof of service to Gagnon for interrogatories and request to produce dated Oct 2, 2012

2091 Dulberg request for production to Gagnon

2094 Dulberg interrogatory to Gagnon

2102 Dulberg answers to (McGuire?) interrogatories

2116 Dulberg proof of service of McGuire interrogatories and notice to produce

2144 to 2437 medical

2442 transcript of Gooch-Flynn hearing in front of judge where Gooch law firm didn't show up

2458 3 chaotic pages of gagnon allstate policy with no useful information

2461 to 2598 financial

2593 Juskie printing 1099

MISSING FROM (pop) – POPOVICH DOCUMENTS HANDED OVER TO CLINTON LAW FIRM ARE:

- 1) Interrogatories from Mast to Gagnon
 - 2) Answers to interrogatories from Mast to Gagnon
 - 3) Request for production from Mast to Gagnon
 - 4) Request for production from Mast to McGuires
 - 5) The documents requested for production by Mast from Gagnon (For example, a certified copy of Gagnon's insurance policy)
 - 6) The documents requested for production by Mast from McGuires (for example, a certified copy of the McGuire's insurance policy)
 - 7) Any information about the limits or terms of Gagnon's insurance policy
 - 8) Interrogatories from Mast to McGuires
 - 9) Answers to interrogatories from Mast to McGuires
- (The only information on the McGuires insurance policy and limits appears in interrogatories from Gagnon to McGuires in (pop 288))
- 10) Hans Mast email Friday, March 13, 2015, 12:18pm. (When examining (pop 31) note that there is one Mast email that is completely blank. We would like to see the contents of that email)

Note: I know that Mast sent out interrogatories and a request for production to Gagnon because (pop 268) is a letter from Mast to Gagnon's lawyer saying Gagnon has yet to respond to Mast's interrogatories and request for production first sent out on Oct 2, 2012. The letter is dated Feb 7, 2013. (ddd 2089) is the proof of service for the interrogatories and request for production from Mast to Gagnon, dated October 2, 2012.

Popovich Document Disclosures (pop) – Flynn submitted to Clinton –
table of contents

3	memo of Nov 20, 2013 meeting with tom and paul
48	list of doctor depositions
56	email: Let's begin lawsuit – should I have surgery?
83	bankruptcy atty to Mast: interested in retaining Mast, claims authority to settle the case
125	mention of 100,000 in Gagnon coverage (feb, 23, 2015)
143	notice to paul of a pre-trial settlement conference on april 9, 2015. dated feb 16, 2015
175	Mast cover letter for sending Gagnon's deposition to Dulberg (Dec 10, 2013)
176	Mast cover letter for sending dulberg's deposition to dulberg (Dec 2, 2013)
177	email about possible neighbor witness (Nov 20, 2013)
181	5,000 offer made Nov 18, 2013
184	Mast offers to settle with Gagnon through Perry
192	7,500 OFFER BY MAST TO BARCH MADE OCT 22, 2013
195	Mast email to Dulberg. Mast's thoughts on the case expressing doubt (October 30, 2013)
212	Mast letter with Sagerman, Levin, Talerico deposition dates (Oct 1 to 16, 2013)
268	Letter from Mast to Perry saying he has yet to respond to interrogatory or production request on October 30, 2012. Perry has yet to reply. Letter dated Feb 7, 2013.
288	Bill McGuire's answers to interrogatory from Gagnon – disclosure of policy and limits
297	certificate of service for McGuire deposition by Gagnon. Note certificate states document was also served on Perry and Mast with date served.

346 from Mast to hospital – answering request for insurance info of "adverse homeowner"

358 Dulberg nervous about surgery being covered. Mast answers about many policies have only 100,000 limit (May, 18, 2012)

361 Dulberg got home owner policy number from Gagnon (May 15, 2012)

365 Mast advises Dulberg to file suit (May 16, 2012)

367 Paul email describing Gagnon getting letter from Mast

371 letter to Gagnon from Mast requesting insurance info (April 11, 2012)

379 McGuire's first claim acknowledgement sent to Mast

384 first letter from Mast to McGuire insurance company

400 recorded Gagnon statement to Mast

560 Barch interrogatories to Gagnon (no insurance info requested)

569 Barch request to produce to Gagnon (nothing about insurance)

594 Gagnon deposition receipt – \$770 (ordered 12-9-2013)

593 Dulberg deposition receipt – \$453 (ordered 11-21-2013)

639 Receipt for McArtor and Carolyn and Bill McGuire depositions (popovich paid)

668 Mast to McGuire's insurance agent informing him of claim (Dec 7, 2011)

670 Mast notice of acceptance to Barch (Dec 26, 2013)

803 email from paul requesting Mast electronic case file. Claims Balke says he turned over everything he got from Mast. dated July 20, 2015.

804 Scott dulberg note: Picked up case file materials 8-17-15

876 Mast to bankruptcy atty – recovery expectation

879 bankruptcy atty first contact with Mast (Jan 6, 2015)

884 Mast memo – first evidence of paul agreeing to settlement (Dec 18, 2013)

885 Memo to Mast: Overview of Talerco deposition from a guy named "bob". It seems mast himself doesn't read the testimony. He just gets "cliff's notes" from bob.

886 "bob" about segerman

887 memo from Hans on Dr Ford's depo dated November 20, 2013

888 "bob" on Kajawa

909 "bob" on segerman

952 Mast memo. Met with Paul and Barb to answer interrogatories. July 24, 2012

955 Mast memo. Met with Barb and Paul. Discussed medical treatment and work history. June 5, 2012

961 Mast new client memo – note by popovich about McGuires being liable for medical bills

964 Mast memo of first meeting with Paul and Barb. Dec 1, 2011

972 Motion to withdraw filed March 13, 2015

988 order of dismissal of McGuires dated Jan 22, 2014

996 McGuire motion to file cross-claim for contribution (against Gagnon)

999 cross-claim complaint

1014 McGuire's affirmative defense – Dulberg guilty of contributory negligence

1179 Perry files appearance on Sept 5, 2012

1189 Barch files appearance on June 12, 2012

1204 barch confirms he is authorized to make offer of 5,000 on Nov 18, 2013

1207 Memo to Jen

1210 Carolyn McGuire deposition

1245 Gagnon deposition

1320 Gagnon answers to interrogatory submitted by Barch

1327 Dulberg deposition
1392 Dulberg interrogatories
1416 McArtor deposition
1437 William McGuire deposition

notes:

first mention of bankruptcy by Dulberg Sept 13, 2013

Mast first expresses doubt about Gagnon case on October 30, 2013 – or
October 22, 2013

nothing between Mast and Grayslake lawyer

nothing between Mast and Baudin

what about Mast work product list?

April 14, 2014 – Mast email that he isn't interested in taking Gagnon
case to trial, suggests Dulberg seek new counsel.

Saul Ferris refused on March 6, 2015 because of 5,000 settlement which
he sees as a mistake

Baudin also sees it as a mistake

Bankruptcy atty suggests getting new lawyer

Mast advice in how to answer deposition questions: (email: folder
2013 01, file Mast2-250)

Timeline of McGuire settlement

OCTOBER 22, 2013: Mast makes settlement offer of \$7,500 to McGuires through their attorney Barch claiming Dulberg discussed it with him and agreed. (pop 192)

OCTOBER 30, 2013: Mast in an email to Dulberg first expresses doubt about Dulberg's case against Gagnon (email: folder 2013 10, files Mast2-213, Mast2-217) (pop 195)

(Note: There is no email evidence of Mast expressing any doubts about the Gagnon or McGuire case until Oct 22, 2013. Only briefly in Febuary of 2013, in relation to the Gagnon deposition and how much it differed from Dulberg's description of the accident, did Mast express anything negative about Dulberg's cases.)

NOVEMBER 4, 2013: Mast requests a meeting with Dulberg. Dulberg brings Barbara, his mother, to the meeting. Neither Dulberg nor Barbara know what the meeting will be about. It is at this meeting that Dulberg is first informed by Mast that Mast believes Dulberg has no case against the McGuires. Mast makes a number of statements which surprise Barbara. He claims that juries in this area are very conservative and Dulberg can't win against an old lady. Dulberg disagrees. It is at this meeting when Dulberg first gives Mast permission look into a settlement. (email: folder 2013 11, file Mast2-211)(witness: Barbara Dulberg, Paul Dulberg)

NOVEMBER 18, 2013: McGuire's attorney Ronald Barch contacts Mast. He claims he has been given authority to make an offer for \$5,000. (pop 181) (pop 1204)

Dulberg is informed by Mast in an email. Mast wrote:

"In addition, the McGuire's atty has offered us (you) \$5,000 in full settlement of the claim against the McGuires only. As we discussed, they have no liability in the case for what Dave did as property owners. So they will likely get out of the case on a motion at some point, so my suggestion is to take the \$5,000 now. " (email: folder 2013 11, file Mast2-201)

Dulberg answers:

"Only 5, That's not much at all.

Is this a take it or leave it or do we have any other options?

...

I'm not happy with the offer."

To which Mast replies:

"Paul whether you like it or not they don't have a legal liability for your injury because they were not directing the work. So if we do not accept their 5000 they will simply file a motion and get out of the case for free. That's the only other option is letting them file motion getting out of the case." (email: folder 2013 11, file Mast2-204)

Dulberg replies:

"I still don't get how they don't feel responsible for work done on their property by their own son that ended up cutting through 40% of my arm. Perhaps their negligence is the fact that they didn't supervise the work close enough but they did oversee much of the days activity with David. Just because Dave was doing the work doesn't mean they were not trying to tell their kid what to do. They told him plenty of times throughout the day what to do. How is that not supervising?"

To which Mast comments:

"Cause they had no say on how Dave did the work. That is what the evidence from all shows." (email: folder 2013 11, file Mast2-204)

Dulberg later replies:

"That's their personal issues of control with their own son. I will testify all day long about the things they wanted him to do that he did do throughout the day.

By claiming they had no control over the work dave did after all the preparation, money and time spent out in the yard yelling at him that they wanted certain things done in a particular way I don't see how they get out of the direct over site of the project because now that there is an injury they don't feel they had any real direct control over their own workers actions?

This is ridiculous.

Hans, they have to do better than claim they had no control over David that day. If that's the case why were they there watching the work most of the day? Even Bill had hands on doing some of the work and rarely let David go to long without checking and seeing if things were being done the way Carol and Him wanted it."

Note: Email exchanges from November 18, 2013 onward show that Dulberg was not happy with the offer of \$5,000 and knew nothing of the Mast offer of \$7,500. They also show he feels the McGuires are partially responsible for his injury. (email: folder 2013 11, files Mast2-202, Mast2-198, Mast2-196, Mast2-190, Mast2-189, Mast2-207, Mast2-205, Mast2-204, email: folder 2013 12, files Mast2-919, Mast2-192, Mast2-187)

NOVEMBER 19, 2013:

Dulberg wrote to Mast:

"Hans,

A while back you told me that the jury's here in this county are primarily conservative and that they know the only reason we are before them is for money.

Not sure if that statement was meant to scare me or not but I do agree, they are, for the most part conservative and I would hope we should make it known we want money for damages, lawyers fees and the medical bills, etc... loud and clear.

We should also make it known to the jury that the parties or their insurance companies have never even offered to pay 1 cent for any of the medical damage and that's why we seek the juries help in settling this dispute. Perhaps if the insurance companies would have paid for these basic things none of us would even be here. but they didn't and now yes after years of waiting I am seeking money to pay for the medical treatments, you as the lawyer and finally myself as I'm the one who has had to suffer the consequences of the Gagnon/McGuire choices on that day.

I cannot believe that a conservative jury isn't going to award anything less than the cost of the medical damages and lawyer fees from them unless something catastrophic changes. I do see them being conservative as to what I will end up with at the end but not the real medical and lawyers bills. Even the conservative juries in this county are not so conservative that they won't give the base bills.

The McGuires insurance is free to go after David for damages if they lose.

Other than fearing a motion to dismiss the suit against the McGuire's insurance based on some false concept that because they didn't have their finger directly on the chainsaw trigger they hold no responsibility for damages.

what are the real benefits of letting them off so easy?

And I don't want to hear its because 2 parties vs 1 is much easier.

Letting off the McGuires insurance for such a small amount is anything but reasonable and I just can't see any ethical judge in this county not keeping them in the suit all the way for a jury to decide whether they had any part to play in the days events and the level of responsibility they share with David for the consequences considering it was the McGuires project, their land, their choice of who did the labor etc. etc...

When you advised me to seek a settlement with the McGuires insurance, I agreed to look at it only because they didn't have their hands directly on the trigger of the chainsaw and That you would get at the least the medical bills paid for out of it. I thought that was made clear in your office.

I know you work on approximately 33%. Is 33% of 5,000 even worth the

time and money you already invested? It's only \$1650 for you and I'm sure your hourly fee eats that up rather quickly, I know mine did back when I had hands and arms that worked so I could charge." (email: folder 2013 11, file Mast2-202)

NOVEMBER 20, 2013:

Mast sends an email to Dulberg:

"Paul, lets meet again to discuss. The legality of it all is that a property owner does not have legal liability for a worker (whether friend, son or otherwise) who does the work on his time, using his own independent skills. Here, I deposed the McGuires, and they had nothing to do with how Dave did the work other than to request the work to be done. They had no control on how Dave wielded the chain saw and cut you. its that simple. We don't have to accept the \$5,000, but if we do not, the McGuires will get out for FREE on a motion. So that's the situation." (email: folder 2013 11 file Mast2-201)

Dulberg replies:

"Ok we can meet. I will call Sheila today and set up a time. Please send me a link to the current Illinois statute citing that the property owner is not liable for work done on their property resulting in injury to a neighbor. I need to read it myself and any links to recent case law in this area would be helpful"

Dulberg agrees to have another meeting with Mast in his office. (memo of meeting: pop 3)

Dulberg brings his brother Thomas Kost with him. Before the meeting Dulberg asks Mast to show examples of case laws which demonstrate that McGuires are not partially responsible for the chainsaw accident. (email: folder 2013 11, file Mast2-201)

In the meeting Mast uses the example of Tilschner vs Spangler. He claims that the McGuires are not responsible because Restatement of Torts 318 is not applicable in Illinois.

He also claims that the accident was not foreseeable by the McGuires and they had no control over Gagnon's actions.

Mast also gave Dulberg a packet of other examples of case law. (ddd 204) (ddd 301)?

Thomas Kost kept a rough set of notes during the meeting. (ddd 1217)

Mast claims that if Dulberg doesn't accept the \$5,000 the McGuires will simply file a motion to get out of the case for free.

Mast said the McGuires do not have to offer anything and are offering \$5,000 to be nice.

Dulberg asked to read the depositions of the McGuires and of Gagnon before making a decision.

Mast writes a Memo to a person named "Jen" (pop 1207)

After the meeting, on the same day, Dulberg goes to the house of a neighbor of the McGuires to ask if they witnessed what was happening on the property the day of the accident. He was looking for a witness that saw the McGuires actively participating in the work being done and supervising the work. (pop 177)(email: folder 2013 11, file Mast2-200)

Later that evening Dulberg writes to Mast:

"Hans,

I'd like to read David's dep before accepting the McGuire offer. Even after reading the McGuire deps and seeing how things easily get skewed in all honesty, I can't blame Carol or Bill for Dave's actions I just thought I was covered under their insurance. I know Carol & Bill thought I was covered as well irregardless of all the half truths in their dep." (email folder 2013 11, file Mast2-198)

NOVEMBER 21, 2013: Mast orders Dulberg's deposition (pop 593)

DECEMBER 2, 2013: Mast sends Dulberg's own deposition to him by mistake (pop 176).

DECEMBER 4, 2013: Dulberg receives his own deposition in the mail. Dulberg again informs Mast he wants to see Gagnon's deposition. (email: folder 2013 12, file Mast2-191)

Dulberg writes to Mast:

"Hans,

I wanted to review David Gagnons dep before letting the McGuires off the hook.

And that word "foreseeable" in the McGuire suite... Well I suppose if I gave anyone a chainsaw and told them to use it, given enough time, an injury is foreseeable, very foreseeable just not hoped for.

And the comment about people not liking friends who sue friends, um well we all should know other than entirely random acts such as auto accidents, train derailments, air plane accidents, etc. Etc.. That most of the time it's those we know who hurt us most often than not. and if it's serious we must be able to sue even if it is or once was a friend." (email: folder 201 12, file Mast2-191)

DECEMBER 9, 2013: Mast orders Gagnon's deposition (pop 594)

DECEMBER 10, 2013: Mast sends Gagnon's deposition to Dulberg (pop 175)

DECEMBER 18, 2013:

Dulberg writes to Mast after reading Gagnon's deposition:

"Hans,

I read through David's dep. it's mostly lies with a few truths. Where should I begin or better yet where would you like me to begin? Almost everything he said was made up, from which end of the branch I was holding, at who's direction I was doing it under and even as to why I was even there on the McGuires property, etc...
Not to mention the nonsense of \$10,000.

...

As far as the McGuires are concerned give me a call." (email: folder 2013 11, file Mast2-189)

Later that evening Dulberg has a long talk with Mast by phone.

Mast writes the following memo after the call:

"On December 18, 2013, I called Paul today after and email and we had a long discussion about the McGuire's liability and he seemed to concede and understand that probably based on the testimony there is nothing we can prove against the McGuire's and he is willing to take their \$5,000 settlement offer." (pop 884)

DECEMBER 26, 2013: Mast contacts McGuire's attorney Barch to inform him that they will accept the \$5,000 offer. (pop 670)

JANUARY 22, 2014: The Judge approves a motion by McGuires for a good-faith settlement. (pop 988)

JANUARY 31, 2014: Final release papers are signed by Dulberg and in the mail. (email: folder 2014 01, file Mast2-180)

APRIL, 14, 2014: Mast informs Dulberg that he does not wish to take the Gagnon case to trial.

For the first time Mast recommends to Dulberg that he look for alternative counsel that wishes to pursue the matter. (email: folder 2014 04, file Mast2-176)

Questions for Mast:

- 1) When did you first express doubts to Dulberg about whether McGuires were liable for Dulberg's injuries? What were those doubts?
- 2) When did you first inform Dulberg that you were unwilling to take the McGuire case to trial and that he should seek a settlement?
- 3) When did you first express doubts about whether Gagnon could be proven to be liable for Dulberg's injuries? What were those doubts?
- 4) When did you first inform Dulberg that you were unwilling to take the Gagnon case to trial?
- 5) If you felt that McGuires were not liable for Dulberg's injuries and you felt it would be difficult to prove Gagnon liable, why didn't you suggest Dulberg seek alternative counsel before accepting the \$5,000 settlement (which wouldn't pay for 10% of Dulberg's medical bills) with the McGuires?
- 6) What new information did you receive between November of 2013 and April 14, 2014 that convinced you that you would be unwilling to take the Gagnon case to trial. If none, than why didn't you inform Dulberg you were unwilling to take the Gagnon case to trial before or while urging him to settle for \$5,000 with the McGuires?
- 7) Did you send interrogatory questions to Gagnon? Did you send a request to produce to Gagnon?
- 8) Did you ever receive Gagnon's answers to interrogatory questions submitted by you? If yes, why were they not included in Dulberg's case file that you gave to him when you withdrew from counsel? If yes, why were they not included in the documents produced in this lawsuit? If yes, then why do this date does nobody seem to have a copy of them?

9) In the documents turned over to Dulberg when you withdrew from counsel, there is a request to produce for Gagnon prepared by you but there is no evidence that Gagnon ever turned over any of the documents requested. One of the documents you requested of Gagnon was a certified copy of his insurance policy. Did you ever receive any of the documents which you requested Gagnon to produce? Did you ever receive a certified copy of Gagnon's insurance policy? If yes, why were they not included in the documents you gave to Dulberg when you withdrew from counsel?

10) In an email from you to Dulberg dated February 26, 2015 about the case file you handed over to Dulberg you wrote, "I don't think I have any insurance policies in the file." Since you requested both the McGuires and Gagnon to produce certified copies of their insurance policies, why didn't you have a certified copy of either insurance policy in Dulberg's case file?

11) Why did you repeatedly inform Dulberg that Gagnon's insurance limit was \$100,000?

12) How did you obtain information that the Gagnon policy limit was \$100,000?

13) Did you make an offer to settle the McGuire case for \$7,500 to Ronald Barch on October 22, 2013? If yes, did Dulberg authorize you to make that offer?

14) Do you have any documented evidence that Dulberg authorized you to make that offer? Do you have any evidence Dulberg authorized you to seek a settlement with the McGuires on or before October 22, 2013?

15) When Ron Barch made an offer of \$5,000 to settle the McGuire case on November 18, 2013, Dulberg's response was that he was unhappy with the amount offered. Do you believe that Dulberg was aware that the offer of \$5,000 was actually a counter-offer to your proposal of \$7,500 made on October 22, 2013? Do you have any evidence that Dulberg was aware that the McGuire offer of \$5,000 was actually a counter-offer to the offer you initiated on October 22, 2013?

16) Dulberg's email reply to the \$5,000 offer of November 18, 2013, dated November 19, 2013, states:

"When you advised me to seek a settlement with the McGuire's insurance, I agreed to look at it only because they did not have their hands directly on the trigger of the chainsaw and that you would get at the least the medical bills paid for out of it. I thought that was made clear in your office."

Did you advise Dulberg to seek a settlement with the McGuires as he stated? Was it first discussed during meeting in your office as he stated? During which office visit was that discussed? Was it at the November 4th meeting or at an office visit that happened earlier?

17) If looking into a settlement was first discussed with Dulberg at the meeting of November 4, 2013, how could you make the \$7,500 offer on October 22, 2013 and claim that Dulberg agreed to it?

18) There was a second meeting between you and Dulberg in your office on November 20, 2013. What was the purpose of the meeting?

19) Did you hand Dulberg documents of case laws at the meeting of November 20, 2013? What case laws were in those documents? Did you discuss cases at the meeting? Which cases were cited? In what way are those cases applicable to the situation with the McGuires?

20) Did you send a request to produce to the McGuires? If yes, why was it not included in the documents you handed over in relation to this lawsuit so far?

21) In a request to produce which you gave to the McGuires, you asked for a certified copy of their insurance policy. They answered that they will give it to you when they receive it. Did you ever receive it? A certified copy of the McGuires insurance policy was not included in the case documents that you turned over to Dulberg when you withdrew from counsel. It was also not included in the documents you turned over in this present lawsuit. Why not?

22) If Dr Levin diagnosed Dulberg with dystonia in August of 2013 and Dr Kajawa diagnosed Dulberg with task specific focal dystonia definitely caused by trauma to his right arm in September of 2013, why did you feel that injury due to Dulberg's chainsaw accident was difficult to prove?

23) Did you read Gagnon's and Dulberg's depositions in order to compare the detailed differences in their version of the days events and the accident?

24) Did you note that Gagnon's description of the accident given to you by phone was very different from how it is described in his deposition? In his description over the telephone he never mentioned anything about Dulberg moving his arm. Later in the deposition he claimed Dulberg moved his right arm into the chainsaw blade. How do you account for this difference?

25) Did you notice that the decription of the chainsaw accident given by Dulberg was completely different from the description of the accident given by Gagnon? For example, Dulberg describes the branch being cut to be about 15 feet long while Gagnon describes it as about 5 feet long. Dulberg describes holding the base of the branch with one hand while Gagnon describes Dulberg holding a 5 foot branch vertically with his left hand above the place where Gagnon was cutting and his right hand holding the same branch below the place where Gagnon was cutting. How do you account for such a large descrepancy?

26) Can you please describe how it is physically possible, using Gagnon's description of the accident given in the deposition, to explain how Dulberg was cut on the lower portion of his right forearm perpendicular to the forarm? (Gagnon described Dulberg holding a branch with his left hand above where Gagnon was cutting and with his right hand below where Gagnon was cutting.)

27) Did you note that your client claimed he was invited by Gagnon to the McGuires to see if he wanted the firewood, not to work?

28) Did you note that your client claimed he was sitting with Carolyn for at least an hour watching Gagnon working with William McGuire, and after William McGuire refused to work any longer it was Carolyn McGuire that first asked Dulberg if he could help Gagnon?

29) Did you note that the McGuires purchased the chainsaw, that they claimed the chainsaw was new, and that they were in possession of the chainsaw and provided it for Gagnon to use contrary to the clear warnings on the cover and opening pages of the chainsaw owners manual?

30) Did you note that the McGuires were in possession of the owners manual and that the manual explicitly has clear warnings written on the cover, on the opening pages and throughout the manual to not do what they admit to allowing to be done with it?

31) If you did not wish to take the McGuire case to trial, why wouldn't you simply advise your client to seek alternative counsel rather than to settle with the McGuires for an amount that wouldn't pay for 10% of his medical bills or anything towards future lost wages?

32) Considering that \$5,000 is such a small amount of money relative to Dulberg's medical bills and practically nothing compared to future lost wages, why would you urge your client sign a release barring any future legal action against the McGuires connected to the chainsaw accident in exchange for such an insignificant sum?

33) Why were you so sure the presiding judge would allow the McGuires to get out of the case on a motion considering the same Judge allowed the complaint to proceed to discovery? Why didn't you believe the judge would allow the case against the McGuires to proceed to trial?

34) Considering that \$5,000 wouldn't change much for Dulberg in the predicament he was in, wouldn't he have been better off in taking his chances by proceeding with new counsel?

From: Hans Mast <hansmast@comcast.net>
Subject: **Re: Pictures of my arm**
Date: January 4, 2012 9:16:03 AM CST
To: pdulberg@comcast.net
▶ 2 Attachments, 5.4 MB

Thanks Paul..

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

From: pdulberg@comcast.net
To: hansmast@comcast.net
Sent: Tue, 03 Jan 2012 22:51:43 -0000 (UTC)
Subject: Pictures of my arm

Hi Hans,

Please find the attached .jpg's. They were taken this afternoon. It is hard to get a picture of the whole scar in one shot because it wraps around my arm. Hopefully these help. I can take more if these don't work.

I have a Dr.'s appointment this friday and will let you know what happens.

Thanks for all your help with this matter.

Paul Dulberg
847-497-4250





From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Pictures of my arm**
Date: December 4, 2016 1:04:52 PM CST
To: paul_dulberg@comcast.net
▶ 2 Attachments, 5.4 MB

Paul Dulberg
847-497-4250
Sent from my iPad

Begin forwarded message:

From: Hans Mast <hansmast@comcast.net>
Date: January 4, 2012 at 9:16:03 AM CST
To: pdulberg@comcast.net
Subject: **Re: Pictures of my arm**

Thanks Paul..

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

From: pdulberg@comcast.net
To: hansmast@comcast.net
Sent: Tue, 03 Jan 2012 22:51:43 -0000 (UTC)
Subject: Pictures of my arm

Hi Hans,

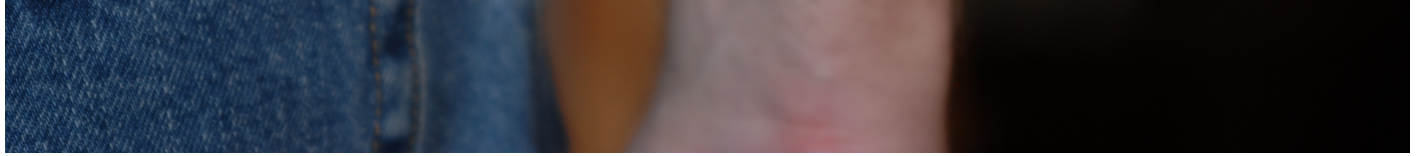
Please find the attached .jpg's. They were taken this afternoon. It is hard to get a picture of the whole scar in one shot because it wraps around my arm. Hopefully these help. I can take more if these don't work.

I have a Dr.'s appointment this friday and will let you know what happens.

Thanks for all your help with this matter.

Paul Dulberg
847-497-4250





From: Hans Mast <hansmast@comcast.net>
Subject: **Re: Original X-ray**
Date: January 24, 2012 4:40:16 PM CST
To: pdulberg@comcast.net
▶ 1 Attachment, 1.5 MB

Thanks for the update.

Hans

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

From: pdulberg@comcast.net
To: hansmast@comcast.net
Sent: Tue, 24 Jan 2012 21:38:41 -0000 (UTC)
Subject: Original X-ray

Hi Hans,
Just picked this up today from Centegra when I was getting the reports.
It's the original x-ray from 6-28-11. It looks much deeper than I thought.

I have 2 dr's visits on Monday and Tuesday next week. will let you know how they go.

Thank you very much for helping me with all this,
Paul

Paul Dulberg
847-497-4250





From: Paul Dulberg <pdulberg@comcast.net>
Subject: Fwd: Original X-ray
Date: December 4, 2016 1:05:29 PM CST
To: paul_dulberg@comcast.net
▶ 1 Attachment, 1.5 MB

Paul Dulberg
847-497-4250
Sent from my iPad

Begin forwarded message:

From: Hans Mast <hansmast@comcast.net>
Date: January 24, 2012 at 4:40:16 PM CST
To: pdulberg@comcast.net
Subject: Re: Original X-ray

Thanks for the update.

Hans

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

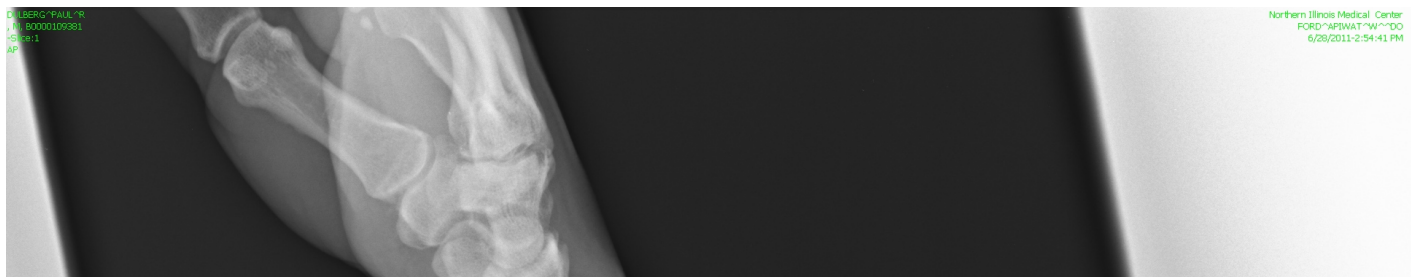
From: pdulberg@comcast.net
To: hansmast@comcast.net
Sent: Tue, 24 Jan 2012 21:38:41 -0000 (UTC)
Subject: Original X-ray

Hi Hans,
Just picked this up today from Centegra when I was getting the reports.
It's the original x-ray from 6-28-11. It looks much deeper than I thought.

I have 2 dr's visits on Monday and Tuesday next week. will let you know how they go.

Thank you very much for helping me with all this,
Paul

Paul Dulberg
847-497-4250





From: Hans Mast <hansmast@comcast.net>
Subject: **Re: MRI Results, SSDI, Physical Therapy**
Date: February 10, 2012 10:13:03 AM CST
To: "pdulberg@comcast.net" <pdulberg@comcast.net>

sounds good Paul! thanks

hans

Sent from my iPhone

On Feb 10, 2012, at 10:08 AM, pdulberg@comcast.net wrote:

Hi Hans,

I just spoke with the receptionist at Associated Neurology. The MRI results are in and they want to see me Monday Morning 9 AM to discuss them. They wouldn't say weather it was good or bad, just that she wanted to see me to discuss it.

I had a meeting with Margret Bradshaw yesterday and she agreed to take on my case for SSDI. She had me sign something to give you a portion of whatever she gets for the referral.

Monday I had a re-evaluation with the physical therapist at dynamic hand therapy. She canceled any further therapy. Said I need to see a hand/arm surgeon ASAP and that physical therapy wasn't going to improve anything at this point.

I'm waiting to hear the MRI results Monday morning before running off to see a hand/arm surgeon.

Thats about it for now and I will let you know the results Monday.

Thanks for everything,
Paul

Paul Dulberg
847-497-4250

From: Hans Mast <hansmast@comcast.net>
Subject: **Re: MRI-Results**
Date: February 13, 2012 1:16:53 PM CST
To: pdulberg@comcast.net

Thank you for the update.

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

From: pdulberg@comcast.net
To: hansmast@comcast.net
Sent: Mon, 13 Feb 2012 19:13:01 -0000 (UTC)
Subject: MRI-Results

Hi Hans,

I received the results from the MRI done on my right arm and Dr. Levin said the MRI came up negative. The physical therapist had already told me that this type of damage seldom shows up on an MRI. Dr. Levin said it was all muscle and tendon damage. Dr. Levin and the physical therapist both suggested I see an hand and arm orthopedic specialist.

I am going to try and make an appointment with DR. Scott Sagerman. Will keep you updated.

Paul Dulberg
847-497-4250

From: Hans Mast <hansmast@comcast.net>
Subject: **Re: Update**
Date: February 27, 2012 2:20:08 PM CST
To: pdulberg@comcast.net

Thanks Paul for the update..

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

From: pdulberg@comcast.net
To: hansmast <hansmast@comcast.net>
Sent: Mon, 27 Feb 2012 19:42:55 -0000 (UTC)
Subject: Update

Hi Hans,

Time for an update. I went to see Dr Sagerman today. He was able to look at the X-Rays, EMG, MRI and Physical Therapy Reports. He did a much better evaluation then I've had in the past and seemed to nail the symptoms and provide possible outcomes. I feel much more confident in his abilities. He is sending me for a new EMG to see if anything has changed. I called Dr Levin and have an appointment for March 8th to do the test.

Thanks again for all your help,

Paul

Paul Dulberg
847-497-4250

From: "Janet Douglass" <janet@ssdatty.com>
Subject: **Re: Update Paul Dulberg**
Date: February 13, 2012 1:25:32 PM CST
To: <pdulberg@comcast.net>

Thank you for the information Paul. I have forwarded your message to Margaret. We can send you an application for applying for benefits from Northwestern University.

Feel free to send updated medical information and questions about your claim to this e-mail address. We just ask that you keep your e-mails related to your claim.

Janet

Janet M. Douglass, Head Paralegal
M. Margaret Bradshaw P.C.
454 W. Jackson Street
Woodstock IL 60098
Ph 815-206-2908
or 877-SSD-Atty
Fx 877-773-9889
Janet@SSDAtty.com
www.SSDAtty.com

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

From: pdulberg@comcast.net
To: janet@ssdatty.com
Sent: Monday, February 13, 2012 1:07 PM
Subject: Update

M. Margaret Bradshaw,

I received the results from the MRI done on my right arm and Dr. Levin said the MRI came up negative. The physical therapist had already told me that this type of damage seldom shows up on an MRI. Dr. Levin said it was all muscle and tendon damage. Dr. Levin and the physical therapist both suggested I see an hand and arm orthopedic specialist.

Today my GP, Dr. Sek, wants me to get an MRI done on my neck. This would not be covered in the lien against the claim for my right arm. So I am at a loss as to how to go about getting this done. While talking to you, I heard you mention Northwestern University. How do I go about applying for this? I would appreciate any help or assistance you may have that will allow me to get this done.

I applied for help at DHS in Woodstock. They received a copy of all my medical records and approved a two month SNAP benefit. Not sure if this will be extended or if they will do any further follow-up. This is a new process for me and I'm not sure how all this works. They said they sent my application for Medicaid to the state and I guess I am waiting for a response.

Thank you for any help you can provide.

Paul Dulberg
847-497-4250

From: "Janet Douglass" <janet@ssdatty.com>
Subject: **Re: SSDI Paul Dulberg**
Date: March 5, 2012 9:01:33 AM CST
To: <pdulberg@comcast.net>

Paul

Yes, this is the correct application form. You could go ahead and complete the application yourself and send it in now. Margaret should be sending you some information soon on your claim. We have a process that we have to complete to open new files and we are still working on yours. Once you receive anything, please give me a call if you have any questions or concerns.

Thank you.

Janet

Janet M. Douglass, Head Paralegal
M. Margaret Bradshaw P.C.
454 W. Jackson Street
Woodstock IL 60098
Ph 815-206-2908
or 877-SSD-Atty
Fx 877-773-9889
Janet@SSDAtty.com
www.SSDAtty.com

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

From: pdulberg@comcast.net
To: janet@ssdatty.com
Sent: Sunday, March 04, 2012 11:09 AM
Subject: SSDI

Hi Janet/Margret,

At our appointment you mentioned you could perhaps help me get medical work done thru Northwestern University. I have e-mailed you twice requesting the forms/applications needed to get this medical help. You have not yet responded. I did try to do a search for these forms and came up with the PDF attached to this e-mail. Is this the correct form? Not sure if you want me to contact NU myself or if you are the one that should be handling this for me. Dr. Sek wants to get another look at my neck because he thinks disc bulging may have increased and that there is further degeneration. There is no way I can afford to get this procedure done and you said you would assist me in getting some sort of medical assistance.

The interview we had is somewhat fleeting as I did get extremely tired. I remember something about family services but can't recall what it was I was supposed to do. Please feel free to call me with anything I should be doing.

Thanks again for all your help,
Paul

Paul Dulberg
847-497-4250

From: Hans Mast <hansmast@comcast.net>
Subject: **Re: EMG Canceled**
Date: March 9, 2012 11:38:28 AM CST
To: pdulberg@comcast.net

Thanks for the update Paul.

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

From: pdulberg@comcast.net
To: Hans Mast <hansmast@comcast.net>
Sent: Fri, 09 Mar 2012 15:30:29 -0000 (UTC)
Subject: EMG Canceled

Hi Hans,
Yesterday I was scheduled for an EMG. Dr. Levin called in sick and rescheduled for Tuesday, March 13th.

Paul

From: Hans Mast <hansmast@comcast.net>
Subject: **Re: EMG Test**
Date: March 15, 2012 11:22:17 AM CDT
To: pdulberg@comcast.net

Thanks for the update Paul. Once all of the follow ups are done, I'll need addresses from all of these Drs so I can gather the bills and records.

Thanks

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

From: pdulberg@comcast.net
To: hansmast <hansmast@comcast.net>
Sent: Thu, 15 Mar 2012 16:17:51 -0000 (UTC)
Subject: EMG Test

Hi Hans,

I had a new EMG test done on Tuesday by Dr. Levin at Associated Neurology. She said I should hear from Dr. Sagerman by Friday with results but she doesn't think the test will show anything because of the localized type of damage to the nerve. She did say that it looks like the paralysis in my right hand is probably permanent since it hasn't shown any signs of healing.

When I was at Dr. Seks office he told me that the Hand Surgeon (Dr. Sagerman) had contacted him and talked about possible exploratory surgery in my arm.

Paul Dulberg
847-497-4250

From: Hans Mast <hansmast@comcast.net>
Subject: **Re: EMG Results**
Date: March 21, 2012 10:20:34 AM CDT
To: pdulberg@comcast.net

Thank. Why dont you set up a visit to come in after that..

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

From: pdulberg@comcast.net
To: hansmast <hansmast@comcast.net>
Sent: Wed, 21 Mar 2012 13:50:06 -0000 (UTC)
Subject: EMG Results

Hi Hans,
I have an appointment with Dr. Sagerman on April 2 to find out the results of the EMG.

Paul

Paul Dulberg
847-497-4250

From: Hans Mast <hansmast@comcast.net>
Subject: Re: EMG Results
Date: March 21, 2012 2:35:17 PM CDT
To: pdulberg@comcast.net

Just give us a call after the visit...thanks

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

From: pdulberg@comcast.net
To: Hans Mast <hansmast@comcast.net>
Sent: Wed, 21 Mar 2012 19:33:18 -0000 (UTC)
Subject: Re: EMG Results

We can do that. Would you like to pick a date now or wait and see what your schedule is around then?

From: "Hans Mast" <hansmast@comcast.net>
To: pdulberg@comcast.net
Sent: Wednesday, March 21, 2012 10:20:34 AM
Subject: Re: EMG Results

Thank. Why dont you set up a visit to come in after that..

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

From: pdulberg@comcast.net
To: hansmast <hansmast@comcast.net>
Sent: Wed, 21 Mar 2012 13:50:06 -0000 (UTC)
Subject: EMG Results

Hi Hans,

I have an appointment with Dr. Sagerman on April 2 to find out the results of the EMG.

Paul

Paul Dulberg
847-497-4250

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical Update**
Date: December 28, 2016 11:39:03 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: May 14, 2012 at 4:15:49 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Medical Update**

Ok

Paul Dulberg
847-497-4250

On May 14, 2012, at 2:41 PM, Hans Mast <hansmast@comcast.net> wrote:

Thanks for the update. We're gonna go ahead and file suit. You may want to let him know that so he isn't angry. He can call me if he wants to talk about it.

Thanks

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

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Mon, 14 May 2012 19:40:20 -0000 (UTC)
Subject: Medical Update

Hi Hans,

I saw Dr. Sagerman today, he scheduled another appointment for this Thursday to meet his partner. They are going to evaluate whether doing surgery is going to be beneficial.

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Another med update**
Date: December 28, 2016 11:39:41 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: May 14, 2012 at 4:14:17 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Another med update**

Hi Hans,

Dr. Sagerman said he would call Dr. Levin the neurologist to get a prescription from her for me. She wants a new appointment with me. It is set up for Wednesday.

Also Dr Sagerman said to keep at physical therapy.

Will let you know what happens after Thursday's appointment.

Thanks again for everything,
Paul

Paul Dulberg
847-497-4250

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical Update**
Date: December 28, 2016 11:40:28 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: May 14, 2012 at 2:40:20 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Medical Update**

Hi Hans,

I saw Dr. Sagerman today, he scheduled another appointment for this Thursday to meet his partner. They are going to evaluate whether doing surgery is going to be beneficial.

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: SSDI / Med update**
Date: December 28, 2016 11:38:30 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: May 16, 2012 at 2:46:55 PM CDT
To: Hans Mast <hansmast@comcast.net>, Janet Douglass <janet@ssdatty.com>
Subject: SSDI / Med update

Hi Hans and Janet,

Forgive me for combining this e-mail to both of you but both of you need the same information.

Met with Dr. Levin today at Associated Neurology. She prescribed Neurontin / Gabapentin 300 MG. I am supposed to take it in the evening for 1 week then move to 2 times daily. Then call her in 2 weeks to see how it's going. She said that it is supposed to help correct the signals from the misfiring nerve in my right arm which is causing the pain when I use my hand. And that the dosage may change depending on how and if it's working. This treatment was suggested by Dr. Sagerman to help try and avoid surgery. If it works I think this is a long term treatment because the prescription lasts for a year and the pharmacist said it goes hand in hand with the other medications I'm taking for long term pain management treatment.

I see Dr. Sagerman and his partner tomorrow for an evaluation at Hand Surgery Associates in Vernon Hills. I will let you know what happens.

Thanks to both of you,
Paul

Paul Dulberg
4606 Hayden Ct.
McHenry, IL. 60051
847-497-4250

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: SSDI medical update**
Date: December 28, 2016 11:37:58 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: May 17, 2012 at 12:09:49 PM CDT
To: Hans Mast <hansmast@comcast.net>, Janet Douglass <janet@ssdatty.com>
Subject: SSDI medical update

Hi Hans and Janet,

I just got back from an appointment with Dr. Sam Biafora, another hand, wrist, elbow & shoulder specialist at hand surgery associates. He did what seemed to be a very thorough evaluation. He dug around pretty deep in my arm and did many different tests on my hand, arm and elbow. He recommended doing surgery to get the scar tissue out of the affected nerve and surrounding area. He said not to have any hope of restoring strength, feeling or reversing the paralyzed muscle that pulls my pinky finger in. But he said that going in and removing the scar tissue from the area will bring relief to the nerve and should stop the pains I get. He said that it will leave a long scar from the back of my elbow to the wrist and they will need to move the ulnar nerve to the inside of the elbow and that it will take approximately 3 months to recuperate. I mentioned the new medication I just started taking that was supposed to help fix the signals from the nerve. He said that all that will do is mask the symptoms for a while and that the only way to actually fix it is to go in and remove the scar tissue and see if any of the cut fibers can be grafted back together. He said that grafting the fibers probably won't work since its been almost a year since they were cut but removing the scar tissue should release the pain and should make a huge difference. He was ready to set up the surgery and I told him I needed a some time to talk with my mom and think about it. He set up another appointment for a month from now so I have time to think it over and said to call Dr. Sagerman if I should decide sooner.

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: I'm nervous about the surgery being covered**
Date: December 28, 2016 11:36:54 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: May 18, 2012 at 2:20:39 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **I'm nervous about the surgery being covered**

Hi Hans,

I'm curious if David Gagnons home owners insurance policy number checked out?

Also, from what I understand this surgery that has been suggested by two different arm specialists, the neurologist and my primary physician is going to run in the neighborhood of \$60,000.00. I want to be sure that it will be covered under the settlement before I decide to do it.

It is a direct result from the chainsaw cut and not anything else. Will it be covered or am I on my own to pay for it?

I am extremely nervous about the cost and getting stuck in bankruptcy and losing my house if it isn't covered.

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical Update**
Date: December 28, 2016 11:34:40 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: June 4, 2012 at 4:03:28 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Medical Update**

Hi Hans,

Just set up an appointment with Sheila for 10:00 AM tomorrow to meet with you.

Just after I set up that appointment with your office my physical therapist called and discharged me until I see the Dr. Said my evaluation was bad and they sent the report to Dr.Sangermans office and for me to call them. After calling the Dr.'s office they bumped up my appointment to Wednesday of this week to discuss surgery.

See you in the morning,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Jun 4, 2012, at 9:58 AM, Hans Mast <hansmast@comcast.net> wrote:

Paul. Lets meet again sometime at the office. When you have time to go over things. Thanks Call my assit. Sheila. 815-344-3797

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

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Fri, 01 Jun 2012 19:40:12 -0000 (UTC)
Subject: Medical Update

Hi Hans,

Today Dr. Levin my neurologist increased my medication of Gabapentin from 300 mg twice a day to 600 mg twice a day. I'm not happy about the increase, it already makes me extremely tired but it's supposed to help with the nerve pain in my right arm.

Not sure if you needed to know this but it is a minor change in the medical condition.

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical Update**
Date: December 28, 2016 11:35:10 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: June 1, 2012 at 2:40:12 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Medical Update**

Hi Hans,

Today Dr. Levin my neurologist increased my medication of Gabapentin from 300 mg twice a day to 600 mg twice a day. I'm not happy about the increase, it already makes me extremely tired but it's supposed to help with the nerve pain in my right arm.

Not sure if you needed to know this but it is a minor change in the medical condition.

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical update**
Date: December 28, 2016 11:33:46 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: June 8, 2012 at 12:05:46 PM CDT
To: Hans Mast <hansmast@comcast.net>
Cc: Janet Douglass <janet@ssdatty.com>
Subject: Medical update

Hi Hans,

Wednesday I met with Dr. Sagerman and I signed the papers for surgery on my right arm. They are going to do an ulnar nerve decompression and transposition, and a neurolysis in the forearm. They are also going to explore and repair any other damage they find with the muscles, tendons and remove scar tissue. I am waiting on a call to find out when and where the surgery will be. They said it should be in the next 4 weeks.

I also need to get some sort of medical release signed by my primary care physician for the surgery so I met with Dr. Sek yesterday and he gave me a checkup and signed the forms.

On another note, when we last met you asked if any of the Dr.'s had been paid yet. I answered no but that wasn't true. I have paid Dr. Sek in full for each visit and Dr. Levin has been partially paid. I also had to just sign a form for Dr. Sangerman allowing them to charge my credit card \$40 a month till my bill was paid in full. I asked if they would do the surgery on a lean against a settlement and gave them your name and number to contact you. They said they would but still required I give them permission to charge my credit card.

If you need anything else please let me know.

Thanks for everything,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Dr. Talerico's contact information**
Date: December 28, 2016 11:31:50 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: June 11, 2012 at 10:23:23 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Dr. Talerico's contact information**

Dr. Talerico
847-247-0547
755 S. Milwaukee Ave.
Suite 250
Libertyville, IL. 60048

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Scott Sagerman & Sam Biafora, Hand surgery associates contact information**
Date: December 28, 2016 11:32:20 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: June 11, 2012 at 10:09:45 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Scott Sagerman & Sam Biafora, Hand surgery associates contact information**

Hi Hans,

Here is the addresses and phone numbers I have for both Scott Sagerman & Sam Biafora at Hand Surgery Associates SC.

(847) 956-0099

515 West Algonquin Road Suite 120
Arlington Heights IL 60005
United States

565 Lakeview Parkway # 140
Vernon Hills IL 60061-1839
United States

37400 Eagle Way
Chicago, IL. 60678

I will send the other hand specialists information in a few minutes

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: SSDI Medical Update**
Date: December 28, 2016 11:30:42 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: June 21, 2012 at 10:10:16 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: SSDI Medical Update**

Hi Hans,

I couldn't help but to laugh at that. The reason I left Dr. Talerico and went to Dr. Sagerman was because he couldn't listen worth a darn and went on a 20 minute rant about prescribing pain medication to me when I never received any prescriptions from him nor did I ever ask him for any pain medication or any other prescription for that matter. Each time I went there it was as if he confused me with someone else. On my last visit with him he couldn't even remember why I was even there and went on another rant about insurance companies. He never even asked or looked at the X-rays from the hospital and I had to ask him numerous times just to get him to read the physical therapy reports. Honestly, he scarred the heck out of me and we were at odds, so I went to see someone else whom I had more confidence in (Dr. Sagerman). I'm sure Dr. Talerico is a good Dr., just one that I felt was probably over worked, was getting confused between his patients and couldn't give me the attention I needed. In retrospect, it fits that his notes are messed up and confirms my feeling about him and why I went to another Dr.

I just called the libertyville office for MidAmerica Hand and Shoulder Clinic. Talked with Gabby. She told me she could not change the record but would make an addendum to the record to clarify that I was not the one operating the chainsaw. She apologized for the confusion and said that it was lost between the Dr.'s notes and the person who transcribes the records. She is going to call your office and fax over the addendum.

Please let me know if you get the addendum and if it is ok

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Jun 21, 2012, at 9:05 AM, Hans Mast <hansmast@comcast.net> wrote:

Paul, just a quick note. I saw records come in from MidAmerica Hand and Shoulder Clinic - Dr. Talerico. The history of your injury suggests you were operating the chain saw yourself - not someone else. This might be troublesome unless you clear that up with Dr. next visit. thanks

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

From: Paul Dulberg <pdulberg@comcast.net>

To: Hans Mast <hansmast@comcast.net>, Janet Douglass <janet@ssdatty.com>
Sent: Tue, 12 Jun 2012 18:09:03 -0000 (UTC)
Subject: SSDI Medical Update

Hi Hans and Janet,

The date for the surgery on my arm is scheduled for [July 9, 2012](#) at either Alexian Brothers or North West Community Hospital. I was told I will be receiving a call from whichever hospital they are able to get for that day.

The first follow up date will be [July 11, 2012](#) at Hand Surgery Associates

Will keep you both updated.

Thanks,
Paul

Paul Dulberg
[847-497-4250](tel:847-497-4250)
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: SSDI Medical Update**
Date: December 28, 2016 11:31:22 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: June 12, 2012 at 1:09:03 PM CDT
To: Hans Mast <hansmast@comcast.net>, Janet Douglass <janet@ssdatty.com>
Subject: **SSDI Medical Update**

Hi Hans and Janet,

The date for the surgery on my arm is scheduled for July 9, 2012 at either Alexian Brothers or North West Community Hospital. I was told I will be receiving a call from whichever hospital they are able to get for that day.

The first follow up date will be July 11, 2012 at Hand Surgery Associates

Will keep you both updated.

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: SSDI medical update**
Date: December 28, 2016 11:29:23 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: July 11, 2012 at 12:45:22 PM CDT
To: Janet Douglass <janet@ssdatty.com>, Hans Mast <hansmast@comcast.net>
Subject: **SSDI medical update**

Hi Hans and Janet,

Just thought I'd let you know the surgery on Monday went well. I'm still under heavy medication and a bit sore. The surgeon said today that he removed a bunch of scar tissue in my right forearm that bonded the muscles and skin as one. He said its all free to move separate now but the scar tissue will return. He said that getting in physical therapy quickly and with a lot of luck it should help to keep it all from bonding together again. He also had to release the ulnar nerve from compression at the elbow. It seems it bound up was under compression and formed a bit of scarring on the nerve. He did not perform the ulnar nerve transposition because he said it seemed like it would be stable enough still in the ulnar groove.

Hope that was a good explanation of what happened. I'm not all with it just yet. I should be feeling better in a few days.

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: SSDI medical update**
Date: December 28, 2016 11:28:07 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: July 12, 2012 at 4:03:42 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: SSDI medical update**

Dr. Sagerman and Dr. Biafora did the procedure at Northwest Community Hospital Building #3 675 W. Kirchoff, Arlington Heights, IL.

Their practice is located at the following two locations;

515 West Algonquin Road Suite 120
Arlington Heights IL 60005

565 Lakeview Parkway # 140
Vernon Hills IL 60061-1839
United States

Paul Dulberg
847-497-4250
Sent from my iPad

On Jul 12, 2012, at 10:44 AM, Hans Mast <hansmast@comcast.net> wrote:

Paul. although we talked about this before, please remind me of the Drs name and address and the facility where the surgery took place. Thanks

Hans

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

From: Paul Dulberg <pdulberg@comcast.net>
To: Janet Douglass <janet@ssdatty.com>, Hans Mast <hansmast@comcast.net>
Sent: Wed, 11 Jul 2012 17:45:22 -0000 (UTC)
Subject: SSDI medical update

Hi Hans and Janet,

Just thought I'd let you know the surgery on Monday went well. I'm still under heavy medication and a bit sore. The surgeon said today that he removed a bunch of scar tissue in my right forearm that bonded the muscles and skin as one. He said its all free to move separate now but the scar tissue will return. He said that getting in physical therapy quickly and with a lot of luck it should help to keep it all from bonding together again. He also had to release the ulnar nerve from compression at the elbow. It seems it bound up was under compression and formed a bit of scarring on the nerve. He did not perform the ulnar nerve

transposition because he said it seemed like it would be stable enough still in the ulnar groove.

Hope that was a good explanation of what happened. I'm not all with it just yet. I should be feeling better in a few days.

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical update**
Date: December 28, 2016 11:27:09 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: August 8, 2012 at 10:00:46 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Medical update**

Hi Hans,

Had another Dr's appointment with Dr. Sagerman at hand surgery associates. He read me the findings from the surgery. He said the chainsaw did not cut the ulnar nerve but the nerve was compressed in the ulnar groove at the elbow. Probably from scar tissue growing in the forearm and pulling the nerve tight in the ulnar groove. The scar tissue had apparently grown and attached my muscles to the skin and each other. Dr Sagerman said they managed to separate the muscles and skin.

I have another appointment with Dr.Sagerman in a month and am doing physical therapy.

I will send a few pictures of what the arm looks like 1 month after the surgery as soon as I can get someone to use the camera for me today.

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: SSDI update**
Date: December 28, 2016 11:26:03 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: August 22, 2012 at 10:26:12 AM CDT
To: Janet Douglass <janet@ssdatty.com>
Subject: **SSDI update**

Hi Janet,

I called the McHenry Community Health Center and set up an appointment for October 4th at 10:45 am with Dr. Elizabeth McMasters.

I don't think I've ever had to see a psychiatrist for anything before. What should I expect and what kind of questions should I be prepared to answer?

Any other advice would be appreciated.

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: MedChex question**
Date: December 28, 2016 11:24:49 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: August 24, 2012 at 11:32:03 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **MedChex question**

Hi Hans,

I looked into the MedChex question.

When I called Open Advanced MRI of Round Lake to get the amount owed I was referred to their corporate office. The corporate office had told me my balance was \$0.00. They looked into who paid the bill and mailed me a breakdown of everything they charged, payments made and any adjustments. The corporate office at OPEN ADVANCED MRI did not know who MedChex was. They said it looked like an insurance payment was what paid my bill. Below is a breakdown of the billing from the corporate office at OPEN ADVANCED MRI.

Original charges from open advanced MRI of round lake.

\$1510.00 for the MRI on 02/03/2012
\$75.00 for the injection on 02/03/2012

\$1585.00 total charges from open advanced MRI of round lake on 02/03/2012

MedChex paid

\$800.00 for the MRI on 02/23/2012
\$0.00 for the injection on 02/23/2012

An adjustment was made to the original charges from open advanced MRI in the amounts of

\$710.00 for the MRI on 02/23/2012
\$75.00 for the injection on 02/23/2012

My balance due reads \$0.00

After a bit of searching the web I came across the contact info for MedChex, gave them a call and asked how they came to pay off my bill with OPEN ADVANCED MRI and what their terms were for paying off the bill.

MedChex claimed I owe them \$3,390.00 for the MRI as of 08/22/2012

The customer Representatives supervisor I spoke with at medchex was named Tish.
Telephone number: (866) 959-1100
Extension: 109

Tish would not provide me with the terms or how MedChex came to negotiate and pay off my bill with OPEN ADVANCED MRI. She would simply repeat that they are a service to help those with no insurance and will be receiving a settlement for injuries. She told me that i did not need to worry about the increased amount from the original billing from OPEN ADVANCED MRI because a settlement would be paying for it. She demanded that I fax her a copy of the billing breakdown from Open Advanced MRI at 888-317-0260. She said that I was never supposed to see what the original billing was and that it is just wrong that I have it and that she would not discuss the terms or how MedChex became involved till I sent this copy to her office. That ended the conversation.

Hans, the only person/firm I ever authorized to handle any and all of my negotiations for medical billing is you and your firm. I will

bring in the breakdown from OPEN ADVANCED MRI to your office on Monday along with a few other bills I have collected.

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: SSDI update**
Date: December 28, 2016 11:23:14 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: September 24, 2012 at 12:08:07 PM CDT
To: Janet Douglass <janet@ssdatty.com>
Subject: **SSDI update**

Hi Janet,

I had to go in for more X-rays this past Saturday for SSDI's independent evaluation at physicians North in Lake Zurich. Two Saturdays ago they took several X-rays of my cervical spine and this past Saturday they took 2 X-rays of my lower lumbar spine. Not sure why they need the lower lumbar but I'll do whatever tests they need.

I did ask to get a copy of the reports for you and I was told I wasn't allowed to receive any from the dr's office but you could request them from SSDI on my behalf.

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: SSDI update Paul Dulberg**
Date: December 28, 2016 11:20:36 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: October 22, 2012 at 3:00:00 PM CDT
To: Janet Douglass <janet@ssdatty.com>
Subject: **Re: SSDI update Paul Dulberg**

Yes, rosecrance. that is if I can find last years tax returns because they require it.

Paul Dulberg
847-497-4250

On Oct 22, 2012, at 1:12 PM, "Janet Douglass" <janet@ssdatty.com> wrote:

Paul --

I forgot to ask you where you are going to do the mental health therapy. Are you going to Rosecrance as Dr McMasters suggested (on the disability report) or are you going to continue to see her at the McHenry Community Clinic?

Please let us know what date you are going to start therapy and where.

Thank you.

Janet

Janet M. Douglass, Head Paralegal
M. Margaret Bradshaw P.C.
454 W. Jackson Street
Woodstock IL 60098
Ph 815-206-2908
or 877-SSD-Atty
Fx 877-773-9889
Janet@SSDAtty.com
www.SSDAtty.com

----- Original Message ----- From: "Paul Dulberg" <pdulberg@comcast.net>
To: "Janet Douglass" <janet@ssdatty.com>
Sent: Monday, October 22, 2012 11:57 AM
Subject: SSDI update

Hi Janet,

Just met with Dr. Sagerman. He suggested that I do physical therapy at home rather than go in to the clinic from this point forward. He set up an appointment to see me in 6 weeks on 12/3/2012.

I told him that I had applied for disability and he said he would fill out any paperwork needed but is still hopeful my arm will regain some strength over time. He also left me on full restrictions.

He had a suggestion for getting my neck looked at. He said to just walk into cook county hospital and have them perform the MRI then take it to a neurologist or Otho to have it read. I told him that Dr. Levin a neurologist offered assistance with my neck once my arm issue was taken care of. He said either way I should get assistance and under a Dr.'s care for it soon.

On another note, Dr. McMasters the psychiatrist suggested therapy and now that I'm not going to physical therapy every other day I'm going to go over and get assistance this week and see how it goes.

That's about it for now. Please let me know if you need anything and thanks for all your help,
Paul

Paul Dulberg
847-497-4250=

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical update**
Date: December 28, 2016 11:21:10 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: October 22, 2012 at 12:02:53 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Medical update**

Hi Hans,

I met with Dr. Sagerman today. He told me to perform physical therapy at home from this point forward. He left me on full restrictions and set up a new appointment in 6 weeks on 12/3/2012. He is hopeful my arm is going to get stronger with time.

That's about it for now if there is anything you need please let me know and thanks for all your help,
Paul

Paul Dulberg
847-497-4250

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: SSDI update**
Date: December 28, 2016 11:21:51 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: October 22, 2012 at 11:57:29 AM CDT
To: Janet Douglass <janet@ssdatty.com>
Subject: **SSDI update**

Hi Janet,

Just met with Dr. Sagerman. He suggested that I do physical therapy at home rather than go in to the clinic from this point forward. He set up an appointment to see me in 6 weeks on 12/3/2012.

I told him that I had applied for disability and he said he would fill out any paperwork needed but is still hopeful my arm will regain some strength over time. He also left me on full restrictions.

He had a suggestion for getting my neck looked at. He said to just walk into cook county hospital and have them perform the MRI then take it to a neurologist or Otho to have it read. I told him that Dr. Levin a neurologist offered assistance with my neck once my arm issue was taken care of. He said either way I should get assistance and under a Dr.'s care for it soon.

On another note, Dr. McMasters the psychiatrist suggested therapy and now that I'm not going to physical therapy every other day I'm going to go over and get assistance this week and see how it goes.

That's about it for now. Please let me know if you need anything and thanks for all your help,
Paul

Paul Dulberg
847-497-4250

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Record release form**
Date: December 28, 2016 11:19:35 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: October 27, 2012 at 9:46:11 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Record release form**

Hi Hans,

Received a letter from you to sign releasing medical and employment records.
Noticed that NW Community Hospital and Juskie Printing, one of my employers were not listed.

Should I just add them and sign or what?

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: SSDI update**
Date: December 28, 2016 11:19:08 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: October 31, 2012 at 7:54:54 AM CDT
To: Janet Douglass <janet@ssdatty.com>
Subject: **SSDI update**

Hi Janet,

I went in to rosecrance yesterday for the initial interview and met with Clair Mendenhall a mental health counselor. I am scheduled to attend a group therapy session with her on Wednesday November 14th at 12:30 pm.

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical update**
Date: December 28, 2016 11:16:49 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: December 3, 2012 at 11:42:53 AM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Medical update**

Hi Hans,

I went to see Dr. Sagerman this morning for a follow up from the surgery on my right arm almost 6 months ago. He wants to see me again in 6 weeks for another follow up.

My Mom, Barb, went with me this morning to make sure I talked to him about my left arm. It has been hurting bad for 3 to 4 weeks now and she wanted me to get his advice. Dr. Sagerman had an X-ray done and said it looks good but I have what is called lateral epicondylitis or tennis elbow in my left elbow. He said it was probably just from over use due to me not using my right arm and could be treated. He said I need therapy for the left arm and prescribed 6 weeks of therapy 2 times a week and would follow up with it at the same time as my next appointment for my right arm.

I went to Fox Lake dynamic hand therapy with the prescription to schedule the appointments. They set the appointment for this Friday at 1:30 pm.

When I got home Dynamic Hand Therapy called. They said they cannot see me because this is not part of the litigation pending from my right arm unless the Dr. says it is. And because I have no insurance it would cost me \$70.00 a visit.

Which there is no way I can afford. I have no income.

Any advice?

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: SSDI update**
Date: December 28, 2016 11:17:29 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: December 3, 2012 at 11:40:57 AM CST
To: Janet Douglass <janet@ssdatty.com>
Subject: **SSDI update**

Hi Janet,

I went to see Dr. Sagerman this morning for a follow up from the surgery on my right arm almost 6 months ago. He wants to see me again in 6 weeks for another follow up.

My Mom, Barb, went with me this morning to make sure I talked to him about my left arm. It has been hurting bad for 3 to 4 weeks now and she wanted me to get his advice. Dr. Sagerman had an X-ray done and said it looks good but I have what is called lateral epicondylitis or tennis elbow in my left elbow. He said it was probably just from over use due to me not using my right arm and could be treated. He said I need therapy for the left arm and prescribed 6 weeks of therapy 2 times a week and would follow up with it at the same time as my next appointment for my right arm.

I went to Fox Lake dynamic hand therapy with the prescription to schedule the appointments. They set the appointment for this Friday at 1:30 pm.

When I got home Dynamic Hand Therapy called. They said they cannot see me because this is not part of the litigation pending from my right arm unless the Dr. says it is. And because I have no insurance it would cost me \$70.00 a visit.

Which there is no way I can afford. I have no income.

Any advice?

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Deposition**
Date: December 28, 2016 11:12:36 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: January 25, 2013 at 9:03:00 AM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Deposition**

Morning Hans,
Yes, I'm curious and nervous, how bad did I screw up yesterday?
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Jan 17, 2013, at 12:46 PM, Hans Mast <hansmast@comcast.net> wrote:

Thanks for the update. When you are better call my assitant Sheila to schedule another preparation meeting. You are a nice person, but in law, nice people finish last. You need to think a lot about coming in with a more laid back and non-responsive approach. The more you talk in a deposition, the more you are losing the case. I think I want to be more strict with you on the "5 words" rule, and have you get comfortable with not exceeding 5 words in any answer. Im gonna ask a lot of you, but you need to do this in order to maximize your recovery in the case.

Here are some thoughts and examples of how you need to testify:

Best 3 responses: "Yes" "No" or "I don't know"

Otherwise, answer only that which is asked - no more

If asked for your name - give your name, not anything more (ie. Address...date of birth..)

Give answers 5 or less words in length

Don't use "because" or ever explain your answers.

If asked to explain, say only what is necessary in 5 words or less

Remember, your purpose is not to make sure the other attorney understands what you are saying. This is not your concern. If the attorney does not understand you, it is HIS job to ask the questions to make him understand. Your only purpose is to answer questions. Therefore, you should not be concerned if the attorney is not understanding you. Therefore, do not worry about explaining yourself in the best most understanding way. Just simply answer the questions.

Do NOT speculate about anything. If you do not know something, say so - Don't guess!

The more you talk, the more information you are giving to be used later against you - it doesn't matter if you think you are saying things to help your case since the more information you give the more the attorney will ask questions and delve into matters that may not otherwise come up - ultimately obtaining information that could be damaging to your case.

Your job at the deposition is only to answer the questions asked of you

Your purpose at the deposition is NOT to explain, convince, argue or otherwise defend your case. If the attorney questioning you does not seem to understand something about your case, TOO BAD. Unless asked a specific question on a matter, you are not to explain or clarify things voluntarily.

The attorney's job is to disbelieve you. Don't think you will convince him/her to change his mind. Don't worry about this.

EXAMPLES

Q: How did your accident happen?

BAD RESPONSE: I was walking out of the store and I wanted to get to the car so I walked down the sidewalk and didn't see anything until after I fell.

GOOD RESPONSE: I was walking down the sidewalk.

REASONING: You were not asked what you were intending to do or what you were thinking.

QUESTION: Did you miss any work due to the accident?

BAD RESPONSE: Yes, I did not go back to work for 2 weeks and lost about \$800.

GOOD RESPONSE: Yes.

REASONING: You were not asked how long you missed from work or how much income you lost. Therefore, don't volunteer this info.

QUESTION: Were you injured in the accident?

BAD RESPONSE: Yes, I hurt my head, back and neck.

GOOD RESPONSE: Yes

Get the idea? If not, we can discuss any questions you have. Please call.

Thanks Paul

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

From: Paul Dulberg <pdulberg@comcast.net>

To: Hans Mast <hansmast@comcast.net>

Sent: Thu, 17 Jan 2013 18:05:39 -0000 (UTC)

Subject: Deposition

Hi Hans,

Just wanted to say its a good thing we rescheduled the deposition because I'm simply not doing well today at all after having the hemroids removed yesterday. I wouldn't have been able to make it in today at all and from what the surgeon said, I wont be able to walk or sit very well for 3 to 5 days. Let me know when you want to do another practice session but its probably best to do anytime after this weekend.

Thanks for all your help,

Paul

Paul Dulberg

847-497-4250

Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Deposition**
Date: December 28, 2016 11:13:43 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: January 17, 2013 at 12:05:39 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Deposition**

Hi Hans,

Just wanted to say its a good thing we rescheduled the deposition because I'm simply not doing well today at all after having the hemroids removed yesterday. I wouldn't have been able to make it in today at all and from what the surgeon said, I wont be able to walk or sit very well for 3 to 5 days. Let me know when you want to do another practice session but its probably best to do anytime after this weekend.

Thanks for all your help,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: SSDI update**
Date: December 28, 2016 11:14:27 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: January 17, 2013 at 11:58:40 AM CST
To: Janet Douglass <janet@ssdatty.com>
Subject: **SSDI update**

Hi Janet,

I met with Dr. Sagerman (hand and arm surgeon) for a follow up on Monday for both my right and left arms. He scheduled another follow up in March and prescribed more physical therapy.

I mentioned a new issue I had to Dr. Sagerman, (hemroids) that I first noticed on Saturday and asked him where I should go. He sent me to Dr. Rosenova an internist. Dr. Rosenovas office had me come in the same day. Dr. Rosenova took one look and sent me to Dr. Daniel Conway a general surgeon to have it removed ASAP.

Dr. Conway took one look and surgically removed the hemroid right there on the spot. I have a follow up with Dr. Conway on February 13th.

I was told by the dr's that hemroids can happen at any age however it usually doesn't happen till after 50 years of age. One of the things that may cause it earlier that seemed to hit home with me as to the cause is stress. With everything I've been through stress makes the most sense to me. Hemroids hurt bad and it's going to take me a few days to recuperate. It hurts to walk, sit, stand, etc...

On another note, I missed my appointment at rosecrance earlier this month because I had a bad neck day and didn't get out of bed all day. I rescheduled with them and will be meeting with them again in February.

I have those forms from SSDI and am going to try and fill them out today and get them to you but i cant promise that i will get it done. The pain meds are simply kicking my butt. With everything that happened this week (hemroid issue) I don't know if I am over the 10 day demand they gave me but I am doing my best. I need to go lay down.

Thanks for everything,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Reply to David's Deposition**
Date: December 28, 2016 11:09:28 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: February 13, 2013 at 2:49:52 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Reply to David's Deposition**

Hans,

Mike is what/who your looking for. He seen and heard David's rant and threat about a lawsuit and any possible monies paid out. I expect him to be off work around 6 pm and I'm sure once he gets your message he will call you.

I'm not sure Mike has even thought about that event since it happened but he doesn't forget things too easily. I'm sure whatever he remembers he would be happy to testify to.

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Feb 13, 2013, at 2:40 PM, Hans Mast <hansmast@comcast.net> wrote:

I dont need the letter..I need witnesses who can show that what he's saying isn't true...

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

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Wed, 13 Feb 2013 20:25:57 -0000 (UTC)
Subject: Re: Reply to David's Deposition

Hans,

Do you remember the email I sent with all the drama when I met with David?
Mike was there, seen and heard everything. Mike will tell you what he heard and watched.
If you don't have the drama letter I can try and find it and resend it.

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Feb 13, 2013, at 1:41 PM, Hans Mast <hansmast@comcast.net> wrote:

Thanks ...I just called him and left him a message. I need to know what he is going to say and when he can give a dep at our offices.

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

From: Paul Dulberg <pdulberg@comcast.net>

To: Hans Mast <hansmast@comcast.net>

Sent: Wed, 13 Feb 2013 19:14:56 -0000 (UTC)

Subject: Re: Reply to David's Deposition

Hi Hans,

Mike McArtor is at work today and will be working everyday this week.

His cell phone is (815) 347-8014.

Mike is willing to do a deposition but needs to schedule it around work.

Thanks again,

Paul

Paul Dulberg

847-497-4250

Sent from my iPad

On Feb 13, 2013, at 12:51 PM, Hans Mast <hansmast@comcast.net> wrote:

Thanks Paul...

Every case has different versions of the same accident. Unfortunately, when there are no witnesses, it's hard to know how the jury will decide a case. David's description of the accident made sense to him and he described it in a way that "could have" occurred even though different from your description. I think the only way to prove him wrong is to show him to be incredible in other ways...for instance his assertion that you told him "you could be rich" in front of your room mate. If your room mate will cooperate and say that David is wrong - that you did not say this, this could be a very good way to show him to be wrong. Would your room mate agree to a deposition in the case? if so, have him call me...thanks Paul....

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

From: Paul Dulberg <pdulberg@comcast.net>

To: Hans Mast <hansmast@comcast.net>

Sent: Wed, 13 Feb 2013 18:03:09 -0000 (UTC)

Subject: Reply to David's Deposition

Hans,

In response to your letter about Gagnon's deposition:

In the first place, why would I hold up the very end of a branch with my damaged left arm? And if I did do it as Dave Gagnon said, I would have had my back to him. What he said makes no sense.

In the second place, if you have ever been cut by a chain saw, the last thing on anyone's mind would be making a profit. I was in so much pain that I could not have talked seriously about anything other than stopping the bleeding and getting to a hospital fast.

David did not come into the hospital with me. He dropped me at the door and was parking the car. He was brought into the ER and questioned by the staff that was there. You can check with whoever was working the ER that day. It's not really my word against David's but David's word against those that were working in the ER.

There is one witness as to David talking about making money off of this accident. Mike Mcartor heard David say this to me in David's garage the day I went up to David's house to get his home owner's insurance policy number per your request. Mike Mcartor is a friend that grew up with David and myself and is currently living at my residence.

Will sign and drop off the medical release forms you requested.

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from mv iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Reply to David's Deposition**
Date: December 28, 2016 11:10:05 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: February 13, 2013 at 2:25:57 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Reply to David's Deposition**

Hans,
Do you remember the email I sent with all the drama when I met with David?
Mike was there, seen and heard everything. Mike will tell you what he heard and watched.
If you don't have the drama letter I can try and find it and resend it.
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Feb 13, 2013, at 1:41 PM, Hans Mast <hansmast@comcast.net> wrote:

Thanks ...I just called him and left him a message. I need to know what he is going to say and when he can give a dep at our offices.

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

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Wed, 13 Feb 2013 19:14:56 -0000 (UTC)
Subject: Re: Reply to David's Deposition

Hi Hans,

Mike McArtor is at work today and will be working everyday this week.
His cell phone is (815) 347-8014.
Mike is willing to do a deposition but needs to schedule it around work.

Thanks again,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Feb 13, 2013, at 12:51 PM, Hans Mast <hansmast@comcast.net> wrote:

Thanks Paul...

Every case has different versions of the same accident. Unfortunately, when there are no witnesses, it's hard to know how the jury will decide a case. David's description of the accident made sense to him and he described it in a way that "could have" occurred even though different from your description. I think the only way to prove him wrong is to show him to be incredible in other ways...for instance his assertion that you told him "you could be rich" in front of your room mate. If your room mate will cooperate and say that David is wrong - that you did not say this, this could be a very good way to show him to be wrong. Would your room mate agree to a deposition in the case? if so, have him call me...thanks Paul....

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

From: Paul Dulberg <pdulberg@comcast.net>

To: Hans Mast <hansmast@comcast.net>

Sent: Wed, 13 Feb 2013 18:03:09 -0000 (UTC)

Subject: Reply to David's Deposition

Hans,

In response to your letter about Gagnon's deposition:

In the first place, why would I hold up the very end of a branch with my damaged left arm? And if I did do it as Dave Gagnon said, I would have had my back to him. What he said makes no sense.

In the second place, if you have ever been cut by a chain saw, the last thing on anyone's mind would be making a profit. I was in so much pain that I could not have talked seriously about anything other than stopping the bleeding and getting to a hospital fast.

David did not come into the hospital with me. He dropped me at the door and was parking the car. He was brought into the ER and questioned by the staff that was there. You can check with whoever was working the ER that day. It's not really my word against David's but David's word against those that were working in the ER.

There is one witness as to David talking about making money off of this accident. Mike Mcartor heard David say this to me in David's garage the day I went up to David's house to get his home owner's insurance policy number per your request.

Mike Mcartor is a friend that grew up with David and myself and is currently living at my residence.

Will sign and drop off the medical release forms you requested.

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Reply to David's Deposition**
Date: December 28, 2016 11:10:36 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: February 13, 2013 at 1:14:56 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Reply to David's Deposition**

Hi Hans,

Mike McArtor is at work today and will be working everyday this week.
His cell phone is (815) 347-8014.
Mike is willing to do a deposition but needs to schedule it around work.

Thanks again,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Feb 13, 2013, at 12:51 PM, Hans Mast <hansmast@comcast.net> wrote:

Thanks Paul...

Every case has different versions of the same accident. Unfortunately, when there are no witnesses, it's hard to know how the jury will decide a case. David's description of the accident made sense to him and he described it in a way that "could have" occurred even though different from your description. I think the only way to prove him wrong is to show him to be incredible in other ways...for instance his assertion that you told him "you could be rich" in front of your room mate. If your room mate will cooperate and say that David is wrong - that you did not say this, this could be a very good way to show him to be wrong. Would your room mate agree to a deposition in the case? if so, have him call me...thanks Paul....

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From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Wed, 13 Feb 2013 18:03:09 -0000 (UTC)
Subject: Reply to David's Deposition

Hans,

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Mike Mcartor is a friend that grew up with David and myself and is currently living at my residence.

Will sign and drop off the medical release forms you requested.

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Reply to David's Deposition**
Date: December 28, 2016 11:11:11 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: February 13, 2013 at 12:03:09 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Reply to David's Deposition**

Hans,

In response to your letter about Gagnon's deposition:

In the first place, why would I hold up the very end of a branch with my damaged left arm? And if I did do it as Dave Gagnon said, I would have had my back to him. What he said makes no sense.

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David did not come into the hospital with me. He dropped me at the door and was parking the car. He was brought into the ER and questioned by the staff that was there. You can check with whoever was working the ER that day. It's not really my word against David's but David's word against those that were working in the ER.

There is one witness as to David talking about making money off of this accident. Mike Mcartor heard David say this to me in David's garage the day I went up to David's house to get his home owner's insurance policy number per your request. Mike Mcartor is a friend that grew up with David and myself and is currently living at my residence.

Will sign and drop off the medical release forms you requested.

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical Expense Report**
Date: December 28, 2016 11:07:20 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: March 25, 2013 at 11:48:55 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Medical Expense Report**

Hi Hans,
Sorry it's taking a bit longer than I thought it would. Should have everything this week.
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Mar 15, 2013, at 3:23 PM, Hans Mast <hansmast@comcast.net> wrote:

Thanks

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

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Fri, 15 Mar 2013 19:36:02 -0000 (UTC)
Subject: Medical Expense Report

Hi Hans,

Just received the medical expense report you sent via us post office.
The total amount of \$40,633.00 is wrong. There are several charges missing.
It will take me a few days to gather all the totals from the various Dr.'s, therapists, pharmacies, hospitals, etc...

The Tennis elbow is being treated by Dr. Sagerman and Dynamic Hand therapy.
Hopefully no surgery will be needed. Keeping my fingers crossed.

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical Expense Report**
Date: December 28, 2016 11:06:27 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: March 26, 2013 at 12:13:15 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Medical Expense Report**

Understood

Paul Dulberg
847-497-4250
Sent from my iPad

On Mar 26, 2013, at 11:27 AM, Hans Mast <hansmast@comcast.net> wrote:

Honestly, that might be difficult for several reasons. Not only will it be impossible to prove that it is due to the trauma, but it may open up the issue before the jury of whether you are a credible witness..so Id be against that frankly....

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

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Tue, 26 Mar 2013 16:23:26 -0000 (UTC)
Subject: Re: Medical Expense Report

Should I be adding treatment and meds for depression?

Paul Dulberg
847-497-4250
Sent from my iPad

On Mar 15, 2013, at 3:23 PM, Hans Mast <hansmast@comcast.net> wrote:

Thanks

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

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Fri, 15 Mar 2013 19:36:02 -0000 (UTC)
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Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical Expense Report**
Date: December 28, 2016 11:06:53 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: March 26, 2013 at 11:23:26 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Medical Expense Report**

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Paul Dulberg
847-497-4250
Sent from my iPad

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Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical Expense Report**
Date: December 28, 2016 11:05:39 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: April 8, 2013 at 4:38:43 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Medical Expense Report**

Hi Hans,

I dropped off the billing today. There is still dynamic hand therapy and Dr. Sagerman who have more to add to the list.

If you have any questions please let me know.

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Mar 15, 2013, at 3:23 PM, Hans Mast <hansmast@comcast.net> wrote:

Thanks

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

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Fri, 15 Mar 2013 19:36:02 -0000 (UTC)
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Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical Expense Report**
Date: December 28, 2016 11:08:02 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: March 15, 2013 at 2:36:02 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Medical Expense Report**

Hi Hans,

Just received the medical expense report you sent via us post office.
The total amount of \$40,633.00 is wrong. There are several charges missing.
It will take me a few days to gather all the totals from the various Dr.'s, therapists, pharmacies, hospitals, etc...

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Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Update**
Date: December 28, 2016 10:57:02 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: April 29, 2013 at 8:03:03 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Update**

Hi Hans,

Thanks for the update.
Thanks for everything.

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Apr 26, 2013, at 2:41 PM, Hans Mast <hansmast@comcast.net> wrote:

Nothing new....the defense has time to depose any of your doctors....we're just waiting for them to take the next step....

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

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Fri, 26 Apr 2013 19:33:07 -0000 (UTC)
Subject: Update

Hi Hans,

It's been a while, thought I'd say hi and check in to see if you need anything.
Let me know how things are going.

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Update**
Date: December 28, 2016 11:04:59 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: April 26, 2013 at 2:33:07 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Update**

Hi Hans,

It's been a while, thought I'd say hi and check in to see if you need anything.
Let me know how things are going.

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Contact info for Mike Thomas**
Date: December 28, 2016 10:55:16 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: June 5, 2013 at 12:14:12 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Contact info for Mike Thomas**

Hi Hans,
Missed your call this morning. I'm here all day so feel free to call when you have time.

I'd suppose they want to know what I did for Mike Thomas.

Here is a brief summary,
I placed an ad to sell off some printing equipment and Mike Thomas came out to see if he wanted anything. This was the first time I met him.
In the process he mentioned that he was setting up a print shop in Richmond IL and asked if we (Mike McArtor and myself) could help. We did help him on and off over the next few months. Mike McArtor still helps out to this day and I do offer them advise when asked. My brother Scott Dulberg and Tom Kost also help Mike Thomas from time to time.

Mike Thomas wanted me to work for him on a regular basis. He offered many different proposals from direct employment, sub contracting, part time, etc... I had to decline after a few months of working with him on and off because I knew I couldn't do that type of work anymore on a regular basis. My arms and hands just can't be relied on.

Working with Mike Thomas taught me what I was and was not capable of doing. I did try to do many things for Mike Thomas that probably was things that I now know I shouldn't do anymore. I had to try, how would I know what i could do if I didn't.

It was a good test to see if I could go back to work on a regular basis. I did try many different types of work for Mike Thomas. It was everything from graphic design to doing little fix it up jobs around his building and even his house in Twin Lakes WI. I introduced my brothers, Scott & Tom, to Mike Thomas to recruit their help with what needed to be done because I wasn't able to do all the things myself anymore. All three, Tom, Mike McArtor and Scott filled in and acted as my hands to get things done.

I did receive compensation in the form of cash for my time. It wasn't much perhaps a few thousand in total but I'm not exactly sure what the exact total was. All the money went to my mother to help out with the bills she was paying on my behalf.

Other than that there isn't anything else I can think of that the defense counsel could hope to get from him.

Feel free to call or I could come in to discuss.

Thanks again,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Jun 4, 2013, at 5:14 PM, Hans Mast <hansmast@comcast.net> wrote:

Thanks. Lets talk Wed about what he might say if deposed in your case.

Sent from my iPhone

On Jun 4, 2013, at 3:55 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

Hi Hans,
Mike McArtor does work with Mike Thomas from time to time.
Here is the contact info for Mike Thomas.
<Mike Thomas.vcf>

Please let me know if the .vcf file worked. If not I can type out the info.
Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Contact info for Mike Thomas**
Date: December 28, 2016 10:55:43 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: June 4, 2013 at 7:18:58 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Contact info for Mike Thomas**

Ok, just let me know when

Paul Dulberg
847-497-4250
Sent from my iPad

On Jun 4, 2013, at 5:14 PM, Hans Mast <hansmast@comcast.net> wrote:

Thanks. Lets talk Wed about what he might say if deposed in your case.

Sent from my iPhone

On Jun 4, 2013, at 3:55 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

Hi Hans,
Mike McArtor does work with Mike Thomas from time to time.
Here is the contact info for Mike Thomas.
<Mike Thomas.vcf>

Please let me know if the .vcf file worked. If not I can type out the info.
Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Contact info for Mike Thomas**
Date: December 28, 2016 10:56:14 AM CST
To: paul_dulberg@comcast.net
▶ 1 Attachment, 0.5 KB

From: Paul Dulberg <pdulberg@comcast.net>
Date: June 4, 2013 at 3:55:20 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Contact info for Mike Thomas**

Hi Hans,
Mike McArtor does work with Mike Thomas from time to time.
Here is the contact info for Mike Thomas.



[Mike Thomas.vcf \(0.5 KB\)](#)

Please let me know if the .vcf file worked. If not I can type out the info.
Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Expense report**
Date: December 28, 2016 10:54:51 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: June 6, 2013 at 7:45:37 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Expense report**

Hi Hans,
The latest expense report sent on May 28th looks like you have everything covered.
Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Anything to update?**
Date: December 28, 2016 10:54:21 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: July 1, 2013 at 9:39:41 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Anything to update?**

Ok,
Thanks

One more thing, I am calling dr Sagerman this morning to set up an appointment. He offered cortisone shots and I had decided to give it more time to heal. Enough Time has passed and it has improved but still catches me off guard and is quite acute so I'm going to go ahead with the shots. I'll let you know.

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Jul 1, 2013, at 9:33 AM, Hans Mast <hansmast@comcast.net> wrote:

Nothing new to report. There is that "guy" we talked about recently that the Defense may want to depose. Otherwise, they can start deposing your doctors....

----- Original Message ----- From: Paul Dulberg <pdulberg@me.com> To: Hans Mast <hansmast@comcast.net> Sent: Fri, 28 Jun 2013 22:27:24 -0000 (UTC) Subject: Anything to update? Hi Hans, Just wondering where things are at? Thanks, Paul Paul Dulberg 847-497-4250 Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Med update and SSDI update**
Date: December 28, 2016 10:53:37 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: July 8, 2013 at 3:36:21 PM CDT
To: Hans Mast <hansmast@comcast.net>, Janet Douglass <janet@ssdatty.com>
Subject: **Med update and SSDI update**

Hi Hans and Janet,

Sorry for sending you both the same letter but you both need the info.

I saw Dr. Sagerman today. He gave me an injection of cortisone and prescribed 6 more weeks of physical therapy.
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Physical Therapy**
Date: December 28, 2016 10:52:56 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: July 24, 2013 at 9:09:26 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Physical Therapy**

Morning Hans,

I started physical therapy after the cortisone shot at Fox Lake Dynamic Hand Therapy yesterday.

They notified me that I owe something around \$25,000.00 and that they just had to close one of their clinics and that they were not willing to take on more at this time. After talking with them for a while they asked me to contact you to see where we are at as far as paying the bill and told me to ask you about how to pay for this round of visits.

I paid out of pocket for yesterday's session.

Thanks again for everything,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Physical Therapy**
Date: December 28, 2016 10:52:14 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: August 7, 2013 at 10:18:40 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Physical Therapy**

Hi Hans,

I've decided to just pay out of pocket for the physical therapy sessions. It needs to be done irregardless.

I am curious as to where we are at with the lawsuit. Any updates would be appreciated.

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Jul 25, 2013, at 1:28 PM, Hans Mast <hansmast@comcast.net> wrote:

Thanks Paul for the update...

as before, while the case is pending, there really is no way to pay the expense until the suit is settled or goes to trial....

Some providers will hold a Lien on the case which guarantees payment when the case settles...not sure if they will, but that is the only way to do it without medical health insurance.

----- Original Message ----- From: Paul Dulberg <pdulberg@comcast.net> To: Hans Mast <hansmast@comcast.net> Sent: Wed, 24 Jul 2013 14:09:26 -0000 (UTC) Subject: Physical Therapy
Morning Hans, I started physical therapy after the cortisone shot at Fox Lake Dynamic Hand Therapy yesterday. They notified me that I owe something around \$25,000.00 and that they just had to close one of their clinics and that they were not willing to take on more at this time. After talking with them for a while they asked me to contact you to see where we are at as far as paying the bill and told me to ask you about how to pay for this round of visits. I paid out of pocket for yesterday's session. Thanks again for everything, Paul Paul Dulberg 847-497-4250 Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical deps**
Date: December 28, 2016 10:51:24 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: August 16, 2013 at 3:56:33 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Medical deps**

Hi Hans,

Just received your letter notifying me of the medical round of deps.
Thanks for the update.

On another note, I went in to see Dr. Levin earlier this week. She said I'm stuck with something called Dystonia in my right arm. Not sure exactly what that is yet but I do have to see dr Sagerman on the 26th and plan to ask about it.

Thanks again for keeping me updated.
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical/SSDI update**
Date: December 28, 2016 10:49:46 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: August 28, 2013 at 11:21:00 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Medical/SSDI update**

Hi Hans,

Thanks for the reminder on the bills. Should have new printouts of the totals by next week.

I have scheduled an appointment with Dr. Kathleen Kujawa on November 14th, 2:30pm at alexian brothers hospital for an evaluation/consultation to see if is in fact Dystonia affecting the severed muscles and branch nerves in my right arm.

Dr. Sagerman told me to finish physical therapy at home for the left arm and left scheduling another visit up to me if I should need it.

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Aug 26, 2013, at 4:41 PM, Hans Mast <hansmast@comcast.net> wrote:

Paul. Thanks for the update. Each time you follow up with your drs. please get a new itemized print out of your entire bill so we can keep the billing "report" updated. I'll send you what bills i have so you can see what we're missing.

Thanks
Hans

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

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>, Janet Douglass <janet@ssdatty.com>
Sent: Mon, 26 Aug 2013 17:32:06 -0000 (UTC)
Subject: Medical/SSDI update

Hi

Had an appointment with Dr. Sagerman today. He called Dr. Levin and discussed Dystonia in the muscle in my right arm that was cut with the chainsaw. They are sending me to another Dr. who specializes in Dystonia. Her name is Dr. Kathleen Kujawa. I will send you a note when the appointment is.

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical/SSDI update**
Date: December 28, 2016 10:50:37 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: August 26, 2013 at 12:32:06 PM CDT
To: Hans Mast <hansmast@comcast.net>, Janet Douglass <janet@ssdatty.com>
Subject: **Medical/SSDI update**

Hi
Had an appointment with Dr. Sagerman today. He called Dr. Levin and discussed Dystonia in the muscle in my right arm that was cut with the chainsaw. They are sending me to another Dr. who specializes in Dystonia. Her name is Dr. Kathleen Kujawa. I will send you a note when the appointment is.
Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Deposition**
Date: December 28, 2016 10:47:25 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: September 20, 2013 at 10:41:27 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Deposition**

Hi Hans,
I sent Mike Thomas your contact info.
Please let me know if he calls.
Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Sep 20, 2013, at 10:12 AM, Hans Mast <hansmast@comcast.net> wrote:

Paul...we need to set his deposition. Can you have him call me.. thanks

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

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Thu, 19 Sep 2013 16:04:55 -0000 (UTC)
Subject: Deposition

Hi Hans,

Received a call yesterday from your secretary concerning Mike Thomas. I'm not really sure what she was asking. Something about treating him as a hostile witness or something?

Give me a call.

Thanks,

Paul

Paul Dulberg
847-497-4250

Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: SSDI**
Date: December 28, 2016 10:49:02 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: September 13, 2013 at 10:21:46 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Fwd: SSDI**

Hi Hans,

I sent the letter below to Janet the person helping with SSDI.
Thought I would ask you the same.

Begin forwarded message:

From: Paul Dulberg <pdulberg@comcast.net>
Date: September 13, 2013, 10:06:45 AM CDT
To: Janet Douglass <janet@ssdaty.com>
Subject: **SSDI**

Hi Janet,

Not sure if your the right person to ask this question but thanks in advance for any insight or help you may be able to provide.

Is it ok to file for bankruptcy while applying for SSDI?

If so, do you work with anyone who handles this?

I have been living off of credit cards for over 2 years now since I was injured and my mom was paying the minimum payments for me. The minimum payments are going to exceed what she can afford. She also pays my mortgage payment every month. It's too much and I have to do something. I have never considered bankruptcy before and know nothing about it. I would like to keep my house if it is possible. I don't have anything else of real value. Most of the credit card usage was for gasoline and medical treatment.

Thanks again in advance for any insight or help you may have,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Deposition**
Date: December 28, 2016 10:46:32 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: September 20, 2013 at 11:21:26 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Fwd: Deposition**

Hi Hans,
Just spoke with Mike Thomas and he doesn't want to call you because he is afraid of getting caught by the IRS for paying me in cash.
Tried to tell him how he paid me doesn't matter but he's afraid and doesn't want to get involved.
Here is all the contact info I have on him.

Mike Thomas
Winning Promotions, LLC

Phone:
(262) 758-8966

Email:
mike@winpromos.com

Website:
<http://www.winpromos.com/>

Work address:
5512 May Ave
Richmond IL 60071
United States

Home address:
460 Waldeck Drive
Twin Lakes WI 53181
United States

Paul Dulberg
847-497-4250
Sent from my iPad

Begin forwarded message:

From: Paul Dulberg <pdulberg@comcast.net>
Date: September 20, 2013, 10:41:27 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Deposition**

Hi Hans,
I sent Mike Thomas your contact info.
Please let me know if he calls.
Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Sep 20, 2013, at 10:12 AM, Hans Mast <hansmast@comcast.net> wrote:

Paul...we need to set his deposition. Can you have him call me.. thanks

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

From: Paul Dulberg <pdulberg@comcast.net>

To: Hans Mast <hansmast@comcast.net>

Sent: Thu, 19 Sep 2013 16:04:55 -0000 (UTC)

Subject: Deposition

Hi Hans,

Received a call yesterday from your secretary concerning Mike Thomas. I'm not really sure what she was asking. Something about treating him as a hostile witness or something?

Give me a call.

Thanks,

Paul

Paul Dulberg

847-497-4250

Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Deposition**
Date: December 28, 2016 10:47:57 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: September 19, 2013 at 11:04:55 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Deposition**

Hi Hans,
Received a call yesterday from your secretary concerning Mike Thomas. I'm not really sure what she was asking. Something about treating him as a hostile witness or something?
Give me a call.
Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Deposition**
Date: December 28, 2016 10:46:57 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: September 20, 2013 at 11:09:01 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Deposition**

Hans,

Mike Thomas just told me he doesn't want to be involved because he is afraid that it will be found out he paid me in cash rather than a 1099 or w2 and he doesn't want any trouble with the IRS.
I tried to tell him none of that matters but he is afraid and won't call you.

Here is his contact info if you want to try.

Mike Thomas

Mobile:

(262) 758-8966

Email:

mike@winpromos.com

Website:

<http://www.winpromos.com/>

Home:

460 Waldeck Drive

Twin Lakes WI 53181

United States

Work:

5512 May Ave

Richmond IL 60071

United States



Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Sep 20, 2013, at 10:12 AM, Hans Mast <hansmast@comcast.net> wrote:

Paul...we need to set his deposition. Can you have him call me.. thanks

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

From: Paul Dulberg <pdulberg@comcast.net>

To: Hans Mast <hansmast@comcast.net>

Sent: Thu, 19 Sep 2013 16:04:55 -0000 (UTC)

Subject: Deposition

Hi Hans,

Received a call yesterday from your secretary concerning Mike Thomas. I'm not really sure what she was asking. Something about treating him as a hostile witness or something?

Give me a call.

Thanks,

Paul

Paul Dulberg

847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: SSDI update for Dr's appointment today**
Date: December 28, 2016 10:45:38 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: September 25, 2013 at 12:53:08 PM CDT
To: Hans Mast <hansmast@comcast.net>, Janet Douglass <janet@ssdatty.com>
Subject: **SSDI update for Dr's appointment today**

Hi Hans and Janet,

Today I met with Dr. Kathryn Kujawa at Alexian brothers hospital. She diagnosed my right arm as task specific Focal Dystonia and said it can be treated on a temporary basis with Botox injections every 3 months or so. My next appointment is for November 19th at 9:45 am to start the treatments. She said it is definitely caused from the trauma in my right arm. I have included her offices contact info below.

If you need anything else please let me know.

Thanks,

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

Dr. Kathryn Kujawa
Eberle Building, 800 Biesterfield Road, Suite 610
Elk Grove Village, IL. 60007
847-981-3630

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Depositions**
Date: December 28, 2016 10:45:06 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: October 22, 2013 at 1:24:09 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Depositions**

Hi Hans,
I'm not sure what you meant by saying there was no medical link from dr Sagermans deposition.
Medical link to what?
Weakness, spasms, loss of feeling, etc...
What has to be linked and why?
Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: Fwd: Medical depositions
Date: December 28, 2016 10:43:55 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: October 30, 2013 at 12:57:25 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: Re: Medical depositions

Quick ?

Are they pitting Dr. Talerico against My other dr's?

He only saw me twice for approx 5-10 minutes and there is a reason I stopped seeing dr Talerico.

Paul Dulberg
847-497-4250
Sent from my iPad

On Oct 30, 2013, at 9:34 AM, Hans Mast <hansmast@comcast.net> wrote:

Paul, here are my thoughts regarding your case. There are two issues. The first liability, or whether Mr. Gagnon is liable for your injury. If he is not proven liable, then it does not matter how badly you were hurt since he will not be found responsible for your damages. The second issue is your damages, or to what extent you were injured due to Mr. Gagnon's acts.

Both of these issues are strongly contested in your case.

As to liability, there were no witnesses to the accident. So, whether Mr. Gagnon will be held responsible for your damages is uncertain and a gamble. That is because it is your word against his word. Our argument is that you were simply holding a limb when he caused the chain saw to strike you. His argument is that you moved your arm in the path of the chain saw unexpectedly. If the jury determines that we did not prove your "version" of the accident, then they can find against you and in favor of Mr. Gagnon at trial.

As to damages, the issue is complicated. That is because your treating physicians do not all agree on exactly what injury you suffered or whether you had a fully recovery or not.

Dr. Talerico at MidAmerica Hand and Shoulder, saw you twice. The first time was in December, six months after your injury. He was not supportive of your claim in most respects. He didn't really feel there was anything wrong with you - as to the forearm. He said that you complained mostly of pain radiating down the forearm from the laceration site with numbness and tingling. On exam he noted no tenderness and it was mostly a normal presentation. Strength was good. He did not see any nerve problem. He prescribed physical therapy due to a muscular sort of symptomology - not nerve related. Apparently you did only 2 sessions of therapy and returned January, 2012. No new complaints at the time. The EMG was normal. He did not believe you were disabled. He continued you on therapy. He saw no evidence of nerve problems. The only symptoms were subjective - not represented by any abnormal exam finding.

Dr. Sagerman has also been deposed. I will summarize his testimony for you soon. His was more favorable, but still limited in what he related to the chain saw accident. Apparently he does not believe you presently have any symptoms relatable to the chain saw injury.

Think about these issues. I will provide you Dr. Sagerman's summary soon.

Hans

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

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Fri, 25 Oct 2013 13:18:24 -0000 (UTC)
Subject: Medical depositions

Morning Hans,

Wanted to touch base this morning because the call from you about something not being medically linked has been on my mind.

I'm not sure what was said during that deposition with the drs that prompted the call but I have been thinking about what it could be. Most likely it was the right elbow procedure.
During my deposition I remember being asked if the two were linked and I answered yes. Let me explain my answer to you.
If the chainsaw had not gone through my arm then the procedure on my elbow wouldn't have happened. That procedure was exploratory to find what was bothering the arm from the chainsaw. Upon opening up the arm they did find some compressions which from my understanding was nothing unusual for a male of my age and very well may or may not have happened during my retreat from the chainsaw when I ended up half way across the yard on the ground. Incidental finding or not it still would not have been found if I hadn't had the chainsaw incident. So as I see it they are linked good or bad and cannot be separated. The exploratory procedure was to find and possibly fix issues relating to the chainsaw incident. They also removed a ton of scar tissue in the forearm on the same day during the same exploratory procedure that was a direct result of the chainsaw.
Hope this helps explain things better.
Let me know,
Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical depositions**
Date: December 28, 2016 10:42:42 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: October 30, 2013 at 2:57:50 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Medical depositions**

Hans,

I don't believe that any reasonable person sitting in a jury is going to give dr talerico's 5 minute evaluation much credit next to dr Sagerman's extensive examinations. I'd bet the farm on Dr. Sagerman over Talerico any day.

Next issue?

Paul Dulberg
847-497-4250
Sent from my iPad

On Oct 30, 2013, at 2:08 PM, Hans Mast <hansmast@comcast.net> wrote:

I understand that Paul. The problem is that you are preaching to the choir. The jury - that will decide this case - doesn't know you or the doctor. If a treating doctor says he doesn't think you were injured badly, they can accept it or believe it. That is the jury's job. And in cases that have complicated medical issues, many times the jury will not be so accommodating and give you the benefit of the doubt. That's why Plaintiff's always have a more difficult time at trial, because they have the burden of proof. And, if the jury doesn't like the evidence they can find against you.

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

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Wed, 30 Oct 2013 18:26:57 -0000 (UTC)
Subject: Re: Medical depositions

Lol, ok.

Hans, if your sick and this dr you don't know says your not, do you go see someone else or do you take his word for it and continue to suffer?

Ask dr Talerico that question.

This dr Talerico guy has no intimate knowledge of my injuries other than 2 very short visits that I walked out of feeling like I was waisting my time because there was no real examination.

I don't even agree with paying for his services.

I have been seeing Dr. Levin and Dr. Sagerman for a couple of years now. And I get to choose who is the best dr for me. Not David or his insurance.

Paul Dulberg
847-497-4250
Sent from my iPad

On Oct 30, 2013, at 1:09 PM, Hans Mast <hansmast@comcast.net> wrote:

Yes. That's how it works.
Sent from my iPhone

On Oct 30, 2013, at 12:57 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

Quick ?

Are they pitting Dr. Talerico against My other dr's?

He only saw me twice for approx 5-10 minutes and there is a reason I stopped seeing dr Talerico.

Paul Dulberg
847-497-4250
Sent from my iPad

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Dr. Talerico at MidAmerica Hand and Shoulder, saw you twice. The first time was in December, six months after your injury. He was not supportive of your claim in most respects. He didn't really feel there was anything wrong with you - as to the forearm. He said that you complained mostly of pain radiating down the forearm from the laceration site with numbness and tingling. On exam he noted no tenderness and it was mostly a normal presentation. Strength was good. He did not see any nerve problem. He prescribed physical therapy due to a muscular sort of symptomology - not nerve related. Apparently you did only 2 sessions of therapy and returned January, 2012. No new complaints at the time. The EMG was normal. He did not believe you were disabled. He continued you on therapy. He saw no evidence of nerve problems. The only symptoms were subjective - not represented by any abnormal exam finding.

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Think about these issues. I will provide you Dr. Sagerman's summary soon.

Hans

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

From: Paul Dulberg <pdulberg@comcast.net>

To: Hans Mast <hansmast@comcast.net>

Sent: Fri, 25 Oct 2013 13:18:24 -0000 (UTC)

Subject: Medical depositions

Morning Hans,

Wanted to touch base this morning because the call from you about something not being medically linked has been on my mind.

I'm not sure what was said during that deposition with the drs that prompted the call but I have been thinking about what it could be. Most likely it was the right elbow procedure.

During my deposition I remember being asked if the two were linked and I answered yes. Let me explain my answer to you.

If the chainsaw had not gone through my arm then the procedure on my elbow wouldn't have happened. That procedure was exploratory to find what was bothering the arm from the chainsaw. Upon opening up the arm they did find some compressions which from my understanding was nothing unusual for a male of my age and very well may or may not have happened during my retreat from the

chainsaw when I ended up half way across the yard on the ground. Incidental finding or not it still would not have been found if I hadn't had the chainsaw incident. So as I see it they are linked good or bad and cannot be separated. The exploratory procedure was to find and possibly fix issues relating to the chainsaw incident. They also removed a ton of scar tissue in the forearm on the same day during the same exploratory procedure that was a direct result of the chainsaw.

Hope this helps explain things better.

Let me know,

Thanks,

Paul

Paul Dulberg

847-497-4250

Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical depositions**
Date: December 28, 2016 10:43:24 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: October 30, 2013 at 1:26:57 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Medical depositions**

Lol, ok.

Hans, if your sick and this dr you don't know says your not, do you go see someone else or do you take his word for it and continue to suffer?
Ask dr Talerico that question.

This dr Talerico guy has no intimate knowledge of my injuries other than 2 very short visits that I walked out of feeling like I was waisting my time because there was no real examination.

I don't even agree with paying for his services.

I have been seeing Dr. Levin and Dr. Sagerman for a couple of years now. And I get to choose who is the best dr for me. Not David or his insurance.

Paul Dulberg
847-497-4250
Sent from my iPad

On Oct 30, 2013, at 1:09 PM, Hans Mast <hansmast@comcast.net> wrote:

Yes. That's how it works.

Sent from my iPhone

On Oct 30, 2013, at 12:57 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

Quick ?
Are they pitting Dr. Talerico against My other dr's?
He only saw me twice for approx 5-10 minutes and there is a reason I stopped seeing dr Talerico.

Paul Dulberg
847-497-4250
Sent from my iPad

On Oct 30, 2013, at 9:34 AM, Hans Mast <hansmast@comcast.net> wrote:

Paul, here are my thoughts regarding your case. There are two issues. The first liability, or whether Mr. Gagnon is liable for your injury. If he is not proven liable, then it does not matter how badly you were hurt since he will not be found responsible for your damages. The second issue is your damages, or to what extent you were injured due to Mr. Gagnon's acts.

Both of these issues are strongly contested in your case.

As to liability, there were no witnesses to the accident. So, whether Mr. Gagnon will be held responsible for your damages is uncertain and a gamble. That is because it is your word against his word. Our argument is that you were simply holding a limb when he caused the chain saw to strike you. His argument is that you moved your arm in the path of the chain saw unexpectedly. If the jury determines that we did not prove your "version" of the accident, then they can find against you and in favor of Mr. Gagnon at trial.

As to damages, the issue is complicated. That is because your treating physicians do not all agree on exactly what injury you suffered or whether you had a fully recovery or not.

Dr. Talerico at MidAmerica Hand and Shoulder, saw you twice. The first time was in December, six months after your injury. He was not supportive of your claim in most respects. He didn't really feel there was anything wrong with you - as to the forearm. He said that you complained mostly of pain radiating down the forearm from the laceration site with numbness and tingling. On exam he noted no tenderness and it was mostly a normal presentation. Strength was good. He did not see any nerve problem. He prescribed physical therapy due to a muscular sort of symptomology - not nerve related. Apparently you did only 2 sessions of therapy and returned January, 2012. No new complaints at the time. The EMG was normal. He did not believe you were disabled. He continued you on therapy. He saw no evidence of nerve problems. The only symptoms were subjective - not represented by any abnormal exam finding.

Dr. Sagerman has also been deposed. I will summarize his testimony for your soon. His was more favorable, but still limited in what he related to the chain saw accident. Apparently he does not believe you presently have any symptoms relatable to the chain saw injury.

Think about these issues. I will provide you Dr. Sagerman's summary soon.

Hans

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

From: Paul Dulberg <pdulberg@comcast.net>

To: Hans Mast <hansmast@comcast.net>

Sent: Fri, 25 Oct 2013 13:18:24 -0000 (UTC)

Subject: Medical depositions

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Let me know,

Thanks,

Paul

Paul Dulberg

847-497-4250

Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical depositions**
Date: December 28, 2016 10:44:22 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: October 25, 2013 at 8:18:24 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Medical depositions**

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Let me know,
Thanks,
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Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: 3 pm meeting**
Date: December 28, 2016 10:39:25 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: November 5, 2013 at 9:46:33 AM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: 3 pm meeting**

Hans,

Below is a link to an article talking about the integration of digital cameras at the centegra facilities.

A friend of mine who works at NIMC for well over a decade just replied to me and she says everything is recorded and available exactly for the purposes we discussed.

<http://www.sdmmag.com/articles/print/success-stories-in-integrating-video-surveillance>

Paul Dulberg
847-497-4250
Sent from my iPad

On Nov 5, 2013, at 9:00 AM, Hans Mast <hansmast@comcast.net> wrote:

no chance, sorry

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

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Mon, 04 Nov 2013 22:54:28 -0000 (UTC)
Subject: Re: 3 pm meeting

Also,

Any chance the hospital (centegra) has video of their parking lots?
This could disprove David's claim of talking before entering the ER.

Thanks,

Paul

Paul Dulberg
847-497-4250

Sent from my iPad

On Nov 4, 2013, at 11:49 AM, Hans Mast <hansmast@comcast.net> wrote:

No need to bring anything, your mom is welcome...

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

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Mon, 04 Nov 2013 17:31:20 -0000 (UTC)
Subject: 3 pm meeting

Hi Hans,

Curious if I should bring anything with me at 3 pm?

Mind if my Mom comes along?

Thanks and see you soon,

Paul

Paul Dulberg
847-497-4250

Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Character reference**
Date: December 28, 2016 10:39:51 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: November 4, 2013 at 9:13:18 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Character reference**

Hi Hans,

Just spoke with John Choyinski a lifelong friend of myself and David Gagnon.

First off I should mention that John has suffered a brain injury in his youth and did spend a few months in a coma and rehab but that was over 20 years ago and he's improved dramatically since. If you should talk with him you will notice something's off about him and I thought the heads up would help. One important note and you have to take my word for this till you talk to him and realize it for yourself, it is that John is damn near incapable of lying. Ask him anything and he's so darn honest he gets himself in trouble and doesn't know it. He often says way too much and I'm sure that can't be good except its what makes him so darn believable.

John is willing to talk about certain aspects of what David has said to him in confidence. John is extremely hesitant to go against David in fear of retribution and rejection from his lifelong friend and is on guard in his reactions and words but this can easily be avoided by asking him questions that skirt around the issue rather than directly at it until he already answered it.

John explained to me tonight that Dave is not the same person I knew a decade ago. These days Dave is all about himself and he has become money hungry. John told me I would have known that if I hadn't been off working all those years and been around more often. John went on to say that he knows that David is lying about how it happened because David seems to think he will have to pay more for insurance and he's so cheap he'd rather screw Paul over than paying 1 penny more or have to admit he did something wrong for no money. John went on to say that David was upset at having to do his Moms tree, didn't want to be there because he wasn't getting money for it and that he was trying to go too fast, didn't tell Paul what he was doing and that's how it happened. At this point Johnny showed confusion and said "um well I mean Paul moved his arm.... Ohhh whatever, I don't want to talk about it any more."

Hans, Johnny is David's longest lasting friend. These two were the closest of buddies growing up. Johnny said he would be willing to talk with you not to go against David but because he knows the troubles I have doing normal things that I used to be able to do very well.

If you start by asking Johnny about my grip or things I have trouble with like hand shakes or opening jars, writing or typing he will go on and on, he needs to be guided a bit in the right direction and soon you will have what you should need about his conversations with David.

But be forewarned, Johnny can go off on tangents and most of what you hear won't have anything to do with what he is there for and I'm more than positive he will say things that will ruin his own credibility.

When I asked johnny if it was ok for you to speak with him he said yes but to give you his home number and not his cell because he doesn't answer calls if he doesn't know the number. He also went on to say his parents told him to stay out of the issue between Dave and I because of David. They fear David may do something drastic if he feels Johnny went against him.

Best time to call him at home is either early morning before 9 am or at 6 pm but he is in and out all day.

John Choyinski Jr.
Home. (815) 385-8483

Hans, John has issues and may not make the best witness in my opinion but he is Dave's lifelong friend and if handled correctly can't lie or should I say can't keep one up for very long.

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: 3 pm meeting**
Date: December 28, 2016 10:40:19 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: November 4, 2013 at 4:54:28 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: 3 pm meeting**

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Sent from my iPad

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Paul Dulberg

847-497-4250

Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: 3 pm meeting**
Date: December 28, 2016 10:41:15 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: November 4, 2013 at 4:52:23 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: 3 pm meeting**

Hans,

I forgot to take a copy of dr Sagermans dep. when I was there.

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

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847-497-4250

Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: 3 pm meeting**
Date: December 28, 2016 10:41:41 AM CST
To: paul_dulberg@comcast.net

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Date: November 4, 2013 at 11:31:20 AM CST
To: Hans Mast <hansmast@comcast.net>
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Subject: **Fwd: 3 pm meeting**
Date: December 28, 2016 10:40:40 AM CST
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Date: November 4, 2013 at 4:54:28 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: 3 pm meeting**

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Paul

Paul Dulberg

847-497-4250

Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Dave's Best and oldest friend John**
Date: December 28, 2016 10:35:38 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: November 18, 2013 at 9:03:30 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Dave's Best and oldest friend John**

That's their personal issues of control with their own son. I will testify all day long about the things they wanted him to do that he did do throughout the day.

By claiming they had no control over the work dave did after all the preparation, money and time spent out in the yard yelling at him that they wanted certain things done in a particular way I don't see how they get out of the direct over site of the project because now that there is an injury they don't feel they had any real direct control over their own workers actions?

This is ridiculous.

Hans, they have to do better than claim they had no control over David that day. If that's the case why were they there watching the work most of the day? Even Bill had hands on doing some of the work and rarely let David go to long without checking and seeing if things were being done the way Carol and Him wanted it.

Paul Dulberg
847-497-4250
Sent from my iPad

On Nov 18, 2013, at 8:36 PM, Hans Mast <hansmast@comcast.net> wrote:

Cause they had no say on how Dave did the work. That is what the evidence from all shows.

Sent from my iPhone

On Nov 18, 2013, at 8:29 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

I still don't get how they don't feel responsible for work done on their property by their own son that ended up cutting through 40% of my arm.

Perhaps their negligence is the fact that they didn't supervise the work close enough but they did oversee much of the days activity with David. Just because Dave was doing the work doesn't mean they were not trying to tell their kid what to do. They told him plenty of times throughout the day what to do. How is that not supervising?

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Nov 18, 2013, at 8:07 PM, Hans Mast <hansmast@comcast.net> wrote:

Paul whether you like it or not they don't have a legal liability for your injury because they were not directing the work. So if we do not accept their 5000 they will simply file a motion and get out of the case for free. That's the only other option is letting them file motion getting out of the case

Sent from my iPhone

On Nov 18, 2013, at 7:40 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

Only 5, That's not much at all.

Is this a take it or leave it or do we have any other options?

If you want a negligence case for the homeowners ask what happened immediately after the accident.

Neither of them offered me any medical assistance nor did either of them call 911 and all Carol could think of besides calling David an idiot was calling her homeowners insurance.

They all left me out in the yard screaming for help while they were busy making sure they were covered.

She even went as far as to finally call the Emergency Room after I was already there just to tell me she was covered.

How selfish are people when they worry about if their insured over helping the person who was hurt and bleeding badly in their yard.

I'm glad she got her answer and had to share it with me only to find out her coverage won't even pay the medical bills.

I'm not happy with the offer.

As far as John Choyinski, he knows he has to call you and said he will tomorrow.

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Nov 18, 2013, at 1:28 PM, Hans Mast <hansmast@comcast.net> wrote:

Im waiting to hear from John. I tried calling him last week, but no one answered.

In addition, the McGuire's atty has offered us (you) \$5,000 in full settlement of the claim against the McGuires only. As we discussed, they have no liability in the case for what Dave did as property owners. So they will likely get out of the case on a motion at some point, so my suggestion is to take the \$5,000 now. You probably won't see any of it due to liens etc. but it will offset the costs deducted from any eventual recovery....

Let me know what you think..

Hans

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

From: Paul Dulberg <pdulberg@comcast.net>

To: Hans Mast <hansmast@comcast.net>

Sent: Fri, 15 Nov 2013 22:41:26 -0000 (UTC)

Subject: Dave's Best and oldest friend John

Hans,

Just spoke with John Choyinski again about talking with you.

I am leaving your number with him as he has agreed to talk with you about David Gagnon.

I believe he will try and call sometime tomorrow.

Paul

Oh and I know that nothing that happened right after the incident makes any difference as to the validity of the injuries but David's conduct immediately after the incident does show his lack of moral values for other humans and what he was willing and was not willing to do to help me get medical help. For his actions towards me or any other human being is enough to sue the shit out him alone. It is the things that happened afterwards that upset me the most.

Sorry for the rant but Dave was a complete ass all the way and deserves this.

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847-497-4250
Sent from my iPad

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Date: December 28, 2016 10:36:11 AM CST
To: paul_dulberg@comcast.net

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Sent from my iPad

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847-497-4250

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Date: November 18, 2013 at 8:19:15 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Fwd: Dave's Best and oldest friend John**

Thinking of what I just wrote,
Should we take the 5 and let them off David's suite and then charge them with the aftermath?
The same can be done with David.
He absolutely refused me a ride to the hospital in his car because I was bleeding so bad.

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

Begin forwarded message:

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I am leaving your number with him as he has agreed to talk with you about David Gagnon.

I believe he will try and call sometime tomorrow.

Paul

Oh and I know that nothing that happened right after the incident makes any difference as to the validity of the injuries but David's conduct immediately after the incident does show his lack of moral values for other humans and what he was willing and was not willing to do to help me get medical help. For his actions towards me or any other human being is enough to sue the shit out him alone. It is the things that happened afterwards that upset me the most.

Sorry for the rant but Dave was a complete ass all the way and deserves this.

Paul Dulberg

847-497-4250

Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Dave's Best and oldest friend John**
Date: December 28, 2016 10:37:22 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: November 18, 2013 at 7:40:23 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Dave's Best and oldest friend John**

Only 5, That's not much at all.

Is this a take it or leave it or do we have any other options?

If you want a negligence case for the homeowners ask what happened immediately after the accident.

Neither of them offered me any medical assistance nor did either of them call 911 and all Carol could think of besides calling David an idiot was calling her homeowners insurance.

They all left me out in the yard screaming for help while they were busy making sure they were covered.

She even went as far as to finally call the Emergency Room after I was already there just to tell me she was covered.

How selfish are people when they worry about if their insured over helping the person who was hurt and bleeding badly in their yard.

I'm glad she got her answer and had to share it with me only to find out her coverage won't even pay the medical bills.

I'm not happy with the offer.

As far as John Choyinski, he knows he has to call you and said he will tomorrow.

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Nov 18, 2013, at 1:28 PM, Hans Mast <hansmast@comcast.net> wrote:

Im waiting to hear from John. I tried calling him last week, but no one answered.

In addition, the McGuire's atty has offered us (you) \$5,000 in full settlement of the claim against the McGuires only. As we discussed, they have no liability in the case for what Dave did as property owners. So they will likely get out of the case on a motion at some point, so my suggestion is to take the \$5,000 now. You probably won't see any of it due to liens etc. but it will offset the costs deducted from any eventual recovery....

Let me know what you think..

Hans

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

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Fri, 15 Nov 2013 22:41:26 -0000 (UTC)
Subject: Dave's Best and oldest friend John

Hans,

Just spoke with John Choyinski again about talking with you.

I am leaving your number with him as he has agreed to talk with you about David Gagnon.

I believe he will try and call sometime tomorrow.

Paul

Oh and I know that nothing that happened right after the incident makes any difference as to the validity of the injuries but David's

conduct immediately after the incident does show his lack of moral values for other humans and what he was willing and was not willing to do to help me get medical help. For his actions towards me or any other human being is enough to sue the shit out him alone. It is the things that happened afterwards that upset me the most.

Sorry for the rant but Dave was a complete ass all the way and deserves this.

Paul Dulberg

847-497-4250

Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Dave's Best and oldest friend John**
Date: December 28, 2016 10:33:35 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: November 20, 2013 at 7:26:53 AM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Dave's Best and oldest friend John**

Morning Hans,

Ok we can meet. I will call Sheila today and set up a time.

Please send me a link to the current Illinois statute citing that the property owner is not liable for work done on their property resulting in injury to a neighbor.

I need to read it myself and any links to recent case law in this area would be helpful as well.

Thanks,

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Nov 20, 2013, at 6:59 AM, Hans Mast <hansmast@comcast.net> wrote:

Paul, lets meet again to discuss. The legality of it all is that a property owner does not have legal liability for a worker (whether friend, son or otherwise) who does the work on his time, using his own independent skills. Here, I deposed the McGuires, and they had nothing to do with how Dave did the work other than to request the work to be done. They had no control on how Dave wielded the chain saw and cut you. its that simple. We don't have to accept the \$5,000, but if we do not, the McGuires will get out for FREE on a motion. So that's the situation.

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

From: Paul Dulberg <pdulberg@comcast.net>

To: Hans Mast <hansmast@comcast.net>

Sent: Tue, 19 Nov 2013 02:29:56 -0000 (UTC)

Subject: Re: Dave's Best and oldest friend John

I still don't get how they don't feel responsible for work done on their property by their own son that ended up cutting through 40% of my arm.

Perhaps their negligence is the fact that they didn't supervise the work close enough but they did oversee much of the days activity with David. Just because Dave was doing the work doesn't mean they were not trying to tell their kid what to do. They told him plenty of times throughout the day what to do. How is that not supervising?

Paul

Paul Dulberg
847-497-4250

Sent from my iPad

On Nov 18, 2013, at 8:07 PM, Hans Mast <hansmast@comcast.net> wrote:

Paul whether you like it or not they don't have a legal liability for your injury because they were not directing the work. So if we do not accept their 5000 they will simply file a motion and get out of the case for free. That's the only other option is letting them file motion getting out of the case

Sent from my iPhone

On Nov 18, 2013, at 7:40 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

Only 5, That's not much at all.

Is this a take it or leave it or do we have any other options?

If you want a negligence case for the homeowners ask what happened immediately after the accident.

Neither of them offered me any medical assistance nor did either of them call 911 and all Carol could think of besides calling David an idiot was calling her homeowners insurance.

They all left me out in the yard screaming for help while they were busy making sure they were covered.

She even went as far as to finally call the Emergency Room after I was already there just to tell me she was covered.

How selfish are people when they worry about if their insured over helping the person who was hurt and bleeding badly in their yard.

I'm glad she got her answer and had to share it with me only to find out her coverage won't even pay the medical bills.

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As far as John Choyinski, he knows he has to call you and said he will tomorrow.

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Paul Dulberg
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Sent from my iPad

On Nov 18, 2013, at 1:28 PM, Hans Mast <hansmast@comcast.net> wrote:

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Let me know what you think..

Hans

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

From: Paul Dulberg <pdulberg@comcast.net>

To: Hans Mast <hansmast@comcast.net>

Sent: Fri, 15 Nov 2013 22:41:26 -0000 (UTC)

Subject: Dave's Best and oldest friend John

Hans,

Just spoke with John Choyinski again about talking with you.

I am leaving your number with him as he has agreed to talk with you about David Gagnon.

I believe he will try and call sometime tomorrow.

Paul

Oh and I know that nothing that happened right after the incident makes any difference as to the validity of the injuries but David's conduct immediately after the incident does show his lack of moral values for other humans and what he was willing and was not willing to do to help me get medical help. For his actions towards me or any other human being is enough to sue the shit out him alone. It is the things that happened afterwards that upset me the most.

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Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Dave's Best and oldest friend John**
Date: December 28, 2016 10:38:15 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: November 15, 2013 at 4:41:26 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Dave's Best and oldest friend John**

Hans,
Just spoke with John Choyinski again about talking with you.
I am leaving your number with him as he has agreed to talk with you about David Gagnon.
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Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: Fwd: Sagerman deposition
Date: December 28, 2016 10:38:55 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: November 15, 2013 at 1:55:11 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: Sagerman deposition

Hi Hans,

Reading through the summary of Dr. Sagermans Deposition I'm curious as to whether Dr. Levin has been deposed? The reason for this question is because of the EMG tests. Dr. Levin only conducted both the tests from just above the scar in the right forearm to the right hand and fingers. She never tested the right elbow which most likely would have identified the compression in the ulnar nerve earlier. She told me she didn't see any reason to give a full test beyond the scarred area even though The Dr asked for a full test of the nerve. She did tell me that all of the branch nerves in the forearm were severed but that is considered minor nerve damage and most likely wouldn't repair itself. Those minor nerves that were ripped out is what caused the loss of feeling in the right forearm and loss of fine motor skills in the areas they control. Again, no major nerve damage was found, only minor nerves but they still hurt like hell and play a significant part.

As far as the MRI, I was told the test cannot tell the difference between scar tissue and good tissue by both Dr. Sagerman and Dr Levin and neither expected to see much from the test.

As far as proving the elbow is a direct, indirect or hypersensitive result from the chainsaw, I don't think anyone can prove or disprove this let alone bet their medical license on this. All I can say to this is that it never bothered me before the incident and I didn't have any of the numbness or tingling prior to the incident. It is possible that the compression existed before the incident and that the trauma to the arm aggravated the nerve causing a hyper sensitivity resulting in the sensations or lack of them. I don't know how or when the compression in the elbow happened. I believe it happened during the incident but cannot prove it. I was in panic mode followed by extreme shock following the chainsaw being lifted into my arm. All I do know is it didn't bother me at all prior to the chainsaw incident or I would have seen a Dr. about it.

On another note, Dr. Sagermans comment about sitting in front of a computer all day shows he has no idea how repetitious keyboarding is or how much work a graphic designer does. I'm curious as to the context of the question he was asked to reply this way and why he doesn't see typing as an extremely repetitious task requiring good dexterity. Every time I try to go at the keyboard, mouse or even write I don't get very far without suffering a spasm in the damaged muscles. It affects much more than just typing. My grip is shot as well and I have a lot of trouble doing regular daily activities like cooking, cleaning, driving, etc... Those spasms happen anytime I try to use those muscles for more than a few minutes repetitiously. Sit at your keyboard and type with your right hand and feel the muscles in your forearm at the same place the chainsaw entered, dug deep and tore out a huge chunk of my arm and ask yourself if issues in those muscles would affect your ability to type or use your fingers for anything. This is a no brainer, of course they do. I don't believe dr Sagerman gave this much thought or may have been asked this question in a context that would put computer keyboarding as a physically non stressful job overall but did not consider the extreme repetition, dexterity or fine motor control it takes to be a professional keyboardist 40-70 hours a week. If all I did was sit in front of a computer all day his statement would be true but to do my job requires one hell of a lot of keyboarding. Wish I could get paid to just sit in front of a computer and not have to type anything. Lol.

On another note, I did not see anything about the self dissolving stitches the Hospital used the day of the incident that never dissolved and Dr. Sagerman had to remove later. He said that accounted for the feeling of needles poking me in my arm and I believe he was right as those feelings stopped after he removed them. That was over a year of feeling those stitches aggravate the forearm and was a huge relief when they were found and removed. Removing those helped to pinpoint the Dystonia.

As far as the disability claim. This incident is what triggered me to file for disability but is only the piece of straw that broke the camels back so to speak and not the sole reason I filed. Disability looks at the whole body and not just this incident. In no way do I suggest the chainsaw is the sole reason I may or may not get disability. It is a cumulation of serious injuries I have suffered that will be the determining factor.

That's all I have for now but I'm sure more will come to mind as time goes on.

Oh, one more thing... You said a trial is like a theatrical production. If we had to go to trial how much approximately would you need in cash to make an overwhelmingly convincing production happen. Let me know so I have an idea of the ballpark figure and can

secure the funds needed.

Hans, I'm asking that when you consider either a settlement or a trial that you ask yourself what it would be worth to you if you had to suffered this type of injury that profoundly changed your day to day living and career.

Thanks again,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Mike Thomas subpoena**
Date: December 28, 2016 10:37:48 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: November 18, 2013 at 6:38:15 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Mike Thomas subpoena**

Hi Hans,
Just heard someone issued a subpoena to Mike Thomas.
Thought you should know.
Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Conservative jury**
Date: December 28, 2016 10:34:40 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: November 19, 2013 at 1:32:42 AM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Conservative jury**

Hans,

A while back you told me that the jury's here in this county are primarily conservative and that they know the only reason we are before them is for money.

Not sure if that statement was meant to scare me or not but I do agree, they are, for the most part conservative and I would hope we should make it known we want money for damages, lawyers fees and the medical bills, etc... loud and clear.

We should also make it known to the jury that the parties or their insurance companies have never even offered to pay 1 cent for any of the medical damage and that's why we seek the juries help in settling this dispute. Perhaps if the insurance companies would have paid for these basic things none of us would even be here. but they didn't and now yes after years of waiting I am seeking money to pay for the medical treatments, you as the lawyer and finally myself as I'm the one who has had to suffer the consequences of the Gagnon/McGuire choices on that day.

I cannot believe that a conservative jury isn't going to award anything less than the cost of the medical damages and lawyer fees from them unless something catastrophic changes. I do see them being conservative as to what I will end up with at the end but not the real medical and lawyers bills. Even the conservative juries in this county are not so conservative that they won't give the base bills.

The McGuires insurance is free to go after David for damages if they lose.

Other than fearing a motion to dismiss the suit against the McGuire's insurance based on some false concept that because they didn't have their finger directly on the chainsaw trigger they hold no responsibility for damages.

what are the real benefits of letting them off so easy?

And I don't want to hear its because 2 parties vs 1 is much easier.

Letting off the McGuires insurance for such a small amount is anything but reasonable and I just can't see any ethical judge in this county not keeping them in the suit all the way for a jury to decide whether they had any part to play in the days events and the level of responsibility they share with David for the consequences considering it was the McGuires project, their land, their choice of who did the labor etc. etc...

When you advised me to seek a settlement with the McGuires insurance, I agreed to look at it only because they didn't have their hands directly on the trigger of the chainsaw and That you would get at the least the medical bills paid for out of it. I thought that was made clear in your office.

I know you work on approximately 33%. Is 33% of 5,000 even worth the time and money you already invested? It's only \$1650 for you and I'm sure your hourly fee eats that up rather quickly, I know mine did back when I had hands and arms that worked so I could charge.

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Conservative jury**
Date: December 28, 2016 10:34:06 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: November 19, 2013 at 1:32:42 AM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Conservative jury**

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Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: More deps**
Date: December 28, 2016 10:31:39 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: November 20, 2013 at 9:24:31 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **More deps**

Hans,
I'd like to read David's dep before accepting the McGuire offer.

Even after reading the McGuire deps and seeing how things easily get skewed in all honesty, I can't blame Carol or Bill for Dave's actions I just thought I was covered under their insurance. I know Carol & Bill thought I was covered as well irregardless of all the half truths in their dep.

Thanks again,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: McGuire deps**
Date: December 28, 2016 10:32:13 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: November 20, 2013 at 7:05:53 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **McGuire deps**

Hans,
Just got done reading those deps.

First off, Glad I'm not a lawyer.
Secondly, it's full of half truths and flat out lies.

Your right, going after those half truths are probably not worth anything in the long run but I do have to comment about the tiller because that one was hysterical.

Dave's best friend John Choyinski was with me when I delivered the tiller and he was the one unloading the trailer and I'm more than positive he would testify to that effect.
It's just amazing how families lie and exaggerate to protect each other but I do understand it, it is Caroline's son.

If there is anything in them we could use or need to be weary of let me know and we can go over it.

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Possible witness**
Date: December 28, 2016 10:32:46 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: November 20, 2013 at 10:44:36 AM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Possible witness**

Hi Hans,
Talked with the McGuire neighbor Brian Beebe

Brian Beebe
815-669-0655
1015 oak leaf ave.
McHenry, IL 60051

He remembers the day the tree work was done and said he watched for a while and talked with the people over there because they had asked him to borrow his chainsaw for the same project but doesn't remember the incident itself. He did tell me he has been used as an expert witness for chainsaw incidents because of the kind of work he does.
He did say that his "x" lived with him at the time and is going to ask her if she remembers anything at all and will get back to us. He seems very willing to help.
He has both yours and my number.
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: McGuire deps**
Date: December 28, 2016 10:30:43 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: November 22, 2013 at 6:23:46 AM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: McGuire deps**

I hope not.

Sounded to me like they claimed to be hiding in their home all day when the neighbor saw them outside actively participating all day.

And Carol seeing me pick up a 200 lb. tiller alone with her own eyes when it was really someone she knew very well since the 1970's and sees once a week at least. This shows a desperate wanting to prove my claim of injury as false.

Those are a bit more than a bad recollection by anyone's standard.

I would feel better if we had in reserve and were ready to use all tools needed to win.

Paul

On Nov 22, 2013, at 5:44 AM, Hans Mast <hansmast@comcast.net> wrote:

Paul there is no reason nor purpose for even discussing perjury. Just because someone has a different recollection doesn't mean the Maguires lied. Anyway it's not an issue that is anything to do with your suit.

But if the Maguires settle they still can be witnesses in the case

Sent from my iPhone

On Nov 22, 2013, at 6:27 AM, Paul Dulberg <pdulberg@comcast.net> wrote:

Hans,

If we take the McGuires off the suit can their deps still be used against us in any way?

John Choyinski stopped by yesterday and I asked him about the tiller. He openly admits being the one who loaded and unloaded the tiller. I recorded the conversation and my Mom was also present and on the tape. Both knew I was recording it in my home. I can send it to you if you need it.

Brian Beebe, McGuire's neighbor told me he saw the McGuires out working in the yard most of the day. He doesn't know their names but said he would recognize them if he saw them.

If their deps can or will be used in any way against us can or should we bring provable perjury charges and have them thrown out?

Thanks,
Paul

Hans,
Just got done reading those deps.

First off, Glad I'm not a lawyer.
Secondly, it's full of half truths and flat out lies.

Your right, going after those half truths are probably not worth anything in the long run but I do have to comment about the tiller because that one was hysterical.

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It's just amazing how families lie and exaggerate to protect each other but I do understand it, it is Caroline's son.

If there is anything in them we could use or need to be weary of let me know and we can go over it.

Thanks,
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Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: McGuire deps**
Date: December 28, 2016 10:31:11 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: November 22, 2013 at 5:27:59 AM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **McGuire deps**

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Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: McGuire offer**
Date: December 28, 2016 10:27:26 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: December 17, 2013 at 6:07:21 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: McGuire offer**

Hi Hans,
Just picked it up in the mail and haven't read it yet.

Is the typed version of the dep actually verbatim or edited somehow?

After reading my own it made me realize not everything said was included.

Thanks again and I'll have an answer sometime tomorrow. This thing looks like a novel.

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Dec 17, 2013, at 3:21 PM, Hans Mast <hansmast@comcast.net> wrote:

Paul, did you receive Gagnon's dep? Let me know what you want me to tell McGuire's attorney about their \$5,000 offer. Thanks
----- Original Message -----

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Sat, 23 Nov 2013 15:48:24 -0000 (UTC)
Subject: Re: Natural progression

Well, luckily I'm not a professional medical dr and my opinion doesn't or shouldn't hold much weight with anyone.

Paul Dulberg
847-497-4250
Sent from my iPad

On Nov 23, 2013, at 9:33 AM, Hans Mast <hansmast@comcast.net> wrote:

No. What is said cannot be unsaid. Sorry.

Sent from my iPhone

On Nov 23, 2013, at 9:12 AM, Paul Dulberg <pdulberg@comcast.net> wrote:

Hi Hans,

After reading the McGuire deps it lead me to do a lot more searching online and now I realize the difficulties I created in my own dep when asked about the right elbow and left arm tennis elbow being a natural progression of injury from the original cause. I probably shouldn't have commented on them at all even though I believe it's all connected.

Is there any way to amend the suit to correct for my ignorance and confusion?

I'm not a dr and tried to say in my dep that I don't want to pretend to know what dr's mean when they say things.

Thanks,
Paul



Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: McGuire offer**
Date: December 28, 2016 10:26:51 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: December 18, 2013 at 11:54:40 AM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: McGuire offer**

Hans,

I read through David's dep. it's mostly lies with a few truths.

Where should I begin or better yet where would you like me to begin?

Almost everything he said was made up, from which end of the branch I was holding, at who's direction I was doing it under and even as to why I was even there on the McGuires property, etc...

Not to mention the nonsense of \$10,000.

The only good thing he has coming from me is my ability to hold back my primal side be civil.
It's a shame we don't live in ancient times under the old eye for an eye philosophy of justice.
I'd much rather take a chainsaw to his arm than get any money.

As far as the McGuires are concerned give me a call.

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Dec 17, 2013, at 6:24 PM, Hans Mast <hansmast@comcast.net> wrote:

Neither are edited. They were Word for Word.

Sent from my iPhone

On Dec 17, 2013, at 6:07 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

Hi Hans,
Just picked it up in the mail and haven't read it yet.

Is the typed version of the dep actually verbatim or edited somehow?

After reading my own it made me realize not everything said was included.

Thanks again and I'll have an answer sometime tomorrow. This thing looks like a novel.

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Dec 17, 2013, at 3:21 PM, Hans Mast <hansmast@comcast.net> wrote:

Paul, did you receive Gagnon's dep? Let me know what you want me to tell McGuires attorney about their \$5,000 offer.
Thanks

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

From: Paul Dulberg <pdulberg@comcast.net>

To: Hans Mast <hansmast@comcast.net>

Sent: Sat, 23 Nov 2013 15:48:24 -0000 (UTC)

Subject: Re: Natural progression

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Paul Dulberg

847-497-4250

Sent from my iPad

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Sent from my iPhone

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I'm not a dr and tried to say in my deposition that I don't want to pretend to know what dr's mean when they say things.

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Natural progression**
Date: December 28, 2016 10:29:29 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: November 23, 2013 at 9:48:24 AM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Natural progression**

Well, luckily I'm not a professional medical dr and my opinion doesn't or shouldn't hold much weight with anyone.

Paul Dulberg
847-497-4250
Sent from my iPad

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I'm not a dr and tried to say in my dep that I don't want to pretend to know what dr's mean when they say things.

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Natural progression**
Date: December 28, 2016 10:30:00 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: November 23, 2013 at 9:12:39 AM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Natural progression**

Hi Hans,

After reading the McGuire depositions it led me to do a lot more searching online and now I realize the difficulties I created in my own deposition when asked about the right elbow and left arm tennis elbow being a natural progression of injury from the original cause. I probably shouldn't have commented on them at all even though I believe it's all connected.

Is there any way to amend the suit to correct for my ignorance and confusion?

I'm not a doctor and tried to say in my deposition that I don't want to pretend to know what doctors mean when they say things.

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Received my own dep in mail?**
Date: December 28, 2016 10:28:26 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: December 4, 2013 at 6:04:55 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Received my own dep in mail?**

Hans,

I wanted to review David Gagnons dep before letting the McGuires off the hook.

And that word "foreseeable" in the McGuire suite...

Well I suppose if I gave anyone a chainsaw and told them to use it, given enough time, an injury is foreseeable, very foreseeable just not hoped for.

And the comment about people not liking friends who sue friends, um well we all should know other than entirely random acts such as auto accidents, train derailments, air plane accidents, etc. Etc.. That most of the time it's those we know who hurt us most often than not. and if it's serious we must be able to sue even if it is or once was a friend.

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Dec 4, 2013, at 5:42 PM, Hans Mast <hansmast@comcast.net> wrote:

I thought you said you wanted to review it.

Sent from my iPhone

On Dec 4, 2013, at 4:43 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

Hans,
Just received my own dep in the mail.
Not sure why?
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Received my own dep in mail?**
Date: December 28, 2016 10:28:04 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: December 4, 2013 at 6:04:55 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Received my own dep in mail?**

Hans,

I wanted to review David Gagnons dep before letting the McGuires off the hook.

And that word "foreseeable" in the McGuire suite...

Well I suppose if I gave anyone a chainsaw and told them to use it, given enough time, an injury is foreseeable, very foreseeable just not hoped for.

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Paul

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Hans,
Just received my own dep in the mail.
Not sure why?
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Received my own dep in mail?**
Date: December 28, 2016 10:28:58 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: December 4, 2013 at 4:43:53 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Received my own dep in mail?**

Hans,
Just received my own dep in the mail.
Not sure why?
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Purchase of chainsaw by McGuires**
Date: December 28, 2016 10:25:54 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: December 19, 2013 at 9:03:42 AM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Purchase of chainsaw by McGuires**

David was the one the neighbor talked to. The neighbor did not know Dave's name but described him to a T and did say he would know him if he saw him.

On another note: I noticed David had the order of cutting down the apple tree before or after the pine tree goofed. Not a big deal but I think Bill, Carols and my own deps agree it was done prior. I remember the same neighbor talking about that day prior to the big trees coming down.

That neighbor has a better view from inside his house of the McGuires back yard than the McGuires do from their own house.

I think David wasn't just confused about the timing, he was trying to show he hadn't done any work prior to this incident. Not sure why but the complete fabrication as a whole shows that David was right, he wouldn't lie to help me but he would lie to help himself.

I'm done ranting...
Reading that dep got me going. Need to let this thing rest for a bit.

Have a good day and enjoy your holidays,
Paul

On Dec 19, 2013, at 8:43 AM, Hans Mast <hansmast@comcast.net> wrote:

Not really

Sent from my iPhone

On Dec 19, 2013, at 8:16 AM, Paul Dulberg <pdulberg@comcast.net> wrote:

Hi Hans,

A while back I sent you the name and number of the McGuires neighbor. I don't have it in front of me at the moment but it's in our correspondence.

The neighbor claimed that the McGuires had asked him to borrow his chainsaw to cut down the trees on the McGuires property just a few days prior to the trees coming down.

It would seem to reason that the McGuires did not own a chainsaw at that point and tried to borrow one from a neighbor before going out and purchasing one specifically for that project.

So my question is, if the McGuires can be proved to be hiding the reason and timing of purchasing the chainsaw can this benefit us in any way?

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Purchase of chainsaw by McGuires**
Date: December 28, 2016 10:26:23 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: December 19, 2013 at 8:16:29 AM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Purchase of chainsaw by McGuires**

Hi Hans,

A while back I sent you the name and number of the McGuires neighbor. I don't have it in front of me at the moment but it's in our correspondence.

The neighbor claimed that the McGuires had asked him to borrow his chainsaw to cut down the trees on the McGuires property just a few days prior to the trees coming down.

It would seem to reason that the McGuires did not own a chainsaw at that point and tried to borrow one from a neighbor before going out and purchasing one specifically for that project.

So my question is, if the McGuires can be proved to be hiding the reason and timing of purchasing the chainsaw can this benefit us in any way?

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Drs appointment**
Date: December 28, 2016 10:25:12 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: January 14, 2014 at 3:41:50 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Drs appointment**

Hi Hans,
I was approved for both Alexian Assist and the medication needed for the Dystonia treatment.
It's on February 6th at Alexian Brothers Hospital with Dr. Kujawa.
Thanks,
Paul
Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Mike Thomas Dep.**
Date: December 28, 2016 10:23:28 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: January 24, 2014 at 11:25:42 AM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Mike Thomas Dep.**

I was looking for it to come in the mail and haven't seen it.

Paul Dulberg
847-497-4250
Sent from my iPad

On Jan 24, 2014, at 11:17 AM, Hans Mast <hansmast@comcast.net> wrote:

Paul, did you send me the signed settlement release yet?

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

From: Paul Dulberg <pdulberg@comcast.net>

To: Hans Mast <hansmast@comcast.net>

Sent: Fri, 17 Jan 2014 20:26:30 -0000 (UTC)

Subject: Re: Mike Thomas Dep.

Ok, I didn't know it was the McGuires who called him in.

Thanks

Paul

Paul Dulberg

847-497-4250

Sent from my iPad

On Jan 17, 2014, at 2:09 PM, Hans Mast <hansmast@comcast.net> wrote:

As you know, we settled with the McGuires...

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

From: Paul Dulberg <pdulberg@comcast.net>

To: Hans Mast <hansmast@comcast.net>

Sent: Fri, 17 Jan 2014 19:27:15 -0000 (UTC)

Subject: Mike Thomas Dep.

Hi Hans,

I just got a text saying that Mike Thomas received a letter mailed Jan. 8th that stated he didn't need to show up for the dep because the case was settled.

Paul

Paul Dulberg

847-497-4250

Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Mike Thomas Dep.**
Date: December 28, 2016 10:24:01 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: January 17, 2014 at 2:26:30 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Mike Thomas Dep.**

Ok, I didn't know it was the McGuires who called him in.
Thanks
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

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Paul
Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Mike Thomas Dep.**
Date: December 28, 2016 10:24:34 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: January 17, 2014 at 1:27:15 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Mike Thomas Dep.**

Hi Hans,

I just got a text saying that Mike Thomas received a letter mailed jan. 8th that stated he didn't need to show up for the dep because the case was settled.

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: McGuire settlement**
Date: December 28, 2016 10:21:55 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: January 29, 2014 at 1:59:31 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: McGuire settlement**

Ok, it's signed and in the mail.

Hope that some yahoo in the govt. doesn't someday decide to go after everyone they think they might get a dollar out of and end up holding me responsible for the McGuires fees incurred while they fight it out.

I'm not in the business of warranting, insuring or protecting the McGuires from government. Especially for only 5 grand. For that kind of protection it could cost millions but I trust your judgement.

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Jan 29, 2014, at 11:49 AM, Hans Mast <hansmast@comcast.net> wrote:

SSD has to be part of it...its not going to effect anything...
We can't prevent disclosure of the amount...

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

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Wed, 29 Jan 2014 17:47:39 -0000 (UTC)
Subject: Re: McGuire settlement

What and why do those questions have any relevance at all and why do they need to be part of this agreement?

Particularly the one about being eligible.

Also, I cannot warranty against what SSDI, Medicare or any other government institution wishes to do.

Is it possible to make this agreement blind to the McGuires or David Gagnon?

What I mean is can we make it so that the amount of money cannot be told to them in any way?

It would drive David's ego crazy if he thought it was a large sum and was banned from seeing how much it is.

Paul Dulberg
847-497-4250

Sent from my iPad

On Jan 29, 2014, at 10:51 AM, Hans Mast <hansmast@comcast.net> wrote:

Its not a big deal...if you weren't receiving it than don't check it...not sure what the question is...

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

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Wed, 29 Jan 2014 16:16:04 -0000 (UTC)
Subject: McGuire settlement

Here is a copy of the first page.

It has check boxes and one of the check boxes says;

I am not eligible to receive SSI or SSDI.

Another says;

I am not receiving SSI or SSDI.

As you know, I have applied for SSDI and SSI

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: McGuire settlement**
Date: December 28, 2016 10:22:23 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: January 29, 2014 at 11:47:39 AM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: McGuire settlement**

What and why do those questions have any relevance at all and why do they need to be part of this agreement?
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Also, I cannot warranty against what SSDI, Medicare or any other government institution wishes to do.

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Paul Dulberg
847-497-4250
Sent from my iPad

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Sent: Wed, 29 Jan 2014 16:16:04 -0000 (UTC)

Subject: McGuire settlement

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Another says;

I am not receiving SSI or SSDI.

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From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: McGuire settlement**
Date: December 28, 2016 10:22:52 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: January 29, 2014 at 9:30:14 AM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **McGuire settlement**

Hi Hans,
I received the papers to sign.
Not sure why it asks about SSDI eligibility.
Please explain.
Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Rosecrance release**
Date: December 27, 2016 7:22:03 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: April 30, 2014 at 7:20:54 PM CDT
To: Bradshaw Social Security Law PC <mailbox@ssdatty.com>
Subject: **Re: Rosecrance release**

I spoke with my counselor at Rosecrance, Dennis, he said the issue is the old records are kept on their old system. He is going to try and have them for me Monday morning.

Paul Dulberg
847-497-4250
Sent from my iPad

On Apr 30, 2014, at 12:13 PM, "Bradshaw Social Security Law PC" <mailbox@ssdatty.com> wrote:

Hi Paul,

Yes it was us. You already signed a release and they sent us very limited records, and I asked for the rest. Since we don't have a decision yet on your case, it can't hurt for you to go ahead and sign whatever they want. If they send additional records that look helpful, we can forward them on.

Thanks!

Meg

Bradshaw Social Security Law P.C.
110 S Johnson Street
Suite 212
Woodstock IL 60098
Ph 815-337-4540
TF 877-SSD-Atty
Fx 815-337-4541
www.SSDAtty.com

----- Original Message ----- From: "Paul Dulberg" <pdulberg@comcast.net>
To: "Janet Douglass" <Janet@SSDAtty.com>
Sent: Monday, April 07, 2014 8:34 AM
Subject: SSDI update

Hi Janet,
Dennis with Rosecrance just called and asked if someone at your office was requesting treatment records. If it's your office I need to go in and sign some sort of release.
Let me know
Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad=

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Rosecrance release**
Date: December 27, 2016 7:22:44 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: April 30, 2014 at 1:09:50 PM CDT
To: Bradshaw Social Security Law PC <mailbox@ssdatty.com>
Subject: **Re: Rosecrance release**

I got the records from rosecrance (minus the original councilors stuff and gave them to Meredith the day of the hearing. Rosecrance was in the process of getting the original records. I'll call and see if they have them.

Paul Dulberg
847-497-4250
Sent from my iPad

On Apr 30, 2014, at 12:13 PM, "Bradshaw Social Security Law PC" <mailbox@ssdatty.com> wrote:

Hi Paul,

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Thanks!

Meg

Bradshaw Social Security Law P.C.
110 S Johnson Street
Suite 212
Woodstock IL 60098
Ph 815-337-4540
TF 877-SSD-Atty
Fx 815-337-4541
www.SSDAtty.com

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To: "Janet Douglass" <Janet@SSDAtty.com>
Sent: Monday, April 07, 2014 8:34 AM
Subject: SSDI update

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Let me know
Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad=

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: SSDI hearing**
Date: December 28, 2016 10:20:47 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: April 11, 2014 at 1:23:34 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **SSDI hearing**

Hi Hans,
Had an SSDI hearing yesterday. Won't know outcome for possibly 6 months. It was a learning experience.
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: SSDI update**
Date: December 28, 2016 9:43:50 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: April 14, 2014 at 9:44:11 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Fwd: SSDI update**

Hans,
What is a small amount?
Is it enough to pay for the medical expenses?

Begin forwarded message:

From: Paul Dulberg <pdulberg@comcast.net>
Date: April 14, 2014 at 9:31:50 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: SSDI update**

Hans,
Thank you for the honesty.
There is no doubt david cut my arm almost in half with a chainsaw. Even he admitted he was in control of it, so What part of the case seems most troubling?
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Apr 14, 2014, at 9:07 AM, Hans Mast <hansmast@comcast.net> wrote:

Paul. We've been talking this case over a bit at the office. As Ive tried to advise you during our several meetings, I do not believe we can adequately prove our case at trial. Its your word against Mr. Gagnons. Most times, that means we lose - as plaintiff. I don't think we want to invest the time and expense to get to that result. Im happy to try to settle the case for you, but it will probably be a low amount. So, I want to advise you now should you wish to retain other counsel to try the case for you. Please advise how you wish to proceed. I know this is not good news, but I have learned a long time ago, some cases just are not proveable - not because you are not credible, but because juries demand more than we can give at trial.

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

From: Paul Dulberg <pdulberg@comcast.net>
To: Meredith Marcus <mmarcus@fdaleylaw.com>
Cc: janet@SSDAtty.com
Sent: Sun, 13 Apr 2014 14:12:04 -0000 (UTC)
Subject: Re: SSDI update

Morning Meredith,

Glad to see the emails are getting to you today. Not sure why they all came back the past few days. Below is Dr. Kujawa's contact info.

If I need to do anything please let me know and thank you for all the work your doing.

Paul

Dr. Kujawa
Alexian Brothers Neuroscience Institute
800 Biesterfield Rd., Suite 610
Elk Grove Village IL 60007
United States
Phone [\(847\) 981-3630](tel:(847)981-3630)
Fax [\(847\) 981-3633](tel:(847)981-3633)

On Apr 13, 2014, at 8:38 AM, Meredith Marcus <mmarcus@fdaleylaw.com> wrote:

Paul,

I was able to get this email! I had written Meg to see the status of the records.

Again, here is what we discussed:

(1) the medical expert gave you a closed claim of benefits - we don't want to take that (i want you to have the ability to appeal any unfavorable decision/not be foreclosed from getting a closed period of benefits and then reapplying if need be) so that is why we went to the vocational expert testimony.

(2) when we went to the Vocational Expert, he gave jobs that conflicted with his testimony so I eliminated the jobs through his testimony (I just need to write a post-hearing memo for that and I am holding off and waiting for the medical records from Dr. Kujawa so i can address ongoing treatment in a memo to the judge as well)

(3) your psych records also reflect you can't do the jobs the vocational expert listed because they all require social contact which your records reflect that you really shouldn't do and the ALJ didn't develop the testimony there - kept saying we were running late - i will address that as well in the memo to the judge.

The records we addressed were requested previously by Meg and from my knowledge we are still waiting on the records (medical records often take quite a long time to come in).

I'll be happy to follow up with Meg/Janet tomorrow to find out the status of the records and if we may require you to get the updated records. While the Dr. Kohn records would show old treatment, it is Dr. Kujawa's records that are more useful (they show ongoing issues during the period in which you are claiming disability). Old records from 2002 will only show that you had problems in 2002 - updated records (from 6/28/11 onward) are key to your case at this point.

I'll be in the office tomorrow to speak further as well (312) 561-3030 if you have any questions.

Thanks,

Meredith E. Marcus, Esq.

Daley Disability Law, P.C.

601 West Randolph Street, Suite 300

Chicago, Illinois 60661

Tel: (312) 561-3030

Fax: (312) 284-4773

(800) DALEY33

mmarcus@fdaleylaw.com

www.fdaleylaw.com

From: Paul Dulberg [pdulberg@comcast.net]

Sent: Sunday, April 13, 2014 8:28 AM

To: Janet Douglass

Cc: Meredith Marcus; Hans Mast

Subject: SSDI update

Hi Janet,

I had the SSDI hearing last Thursday. It was a learning experience and I am not sure how it went. Much of it I didn't understand.

We were missing some of the reports. Particularly anything from Dr. Kujawa showing ongoing care for post traumatic Dystonia in the right forearm and some old reports from Dr. Kohn who was the Dr. who gave me over 100 shots in my neck, shoulders and back for severe muscle spasms after the car accident over a decade ago. Dr. Kohn from Kohn medical group in McHenry, I completely forgot about until the questions about muscle

spasms came up in the hearing.

The judge left open the record for 30 days for us to add anything to the medical record.

Should I be the one to get the old reports from dr Kohn and the ongoing reports from dr Kujawa?

Also, Meredith Marcus, the attorney from Daley Disability law, asked me to send her Dr. Kujawa's contact information but her email (mmarcus@fdaleylaw.com) keeps getting sent back to me with an error saying its undeliverable. I'm not sure how to get around the emails being sent back. What should I do?

Thanks again for everything,

Paul

Paul Dulberg

847-497-4250

Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: Fwd: SSDI update
Date: December 28, 2016 10:19:19 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: April 13, 2014 at 8:58:04 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: Fwd: SSDI update

Hans,
Just keeping you in the loop. Here is the reply to the email I just sent out.

Begin forwarded message:

From: Meredith Marcus <mmarcus@fdaleylaw.com>
Date: April 13, 2014 at 8:38:37 AM CDT
To: Paul Dulberg <pdulberg@comcast.net>
Cc: "janet@SSDAtty.com" <janet@SSDAtty.com>
Subject: RE: SSDI update

Paul,

I was able to get this email! I had written Meg to see the status of the records.

Again, here is what we discussed:

(1) the medical expert gave you a closed claim of benefits - we don't want to take that (i want you to have the ability to appeal any unfavorable decision/not be foreclosed from getting a closed period of benefits and then reapplying if need be) so that is why we went to the vocational expert testimony.
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Meredith E. Marcus, Esq.

Daley Disability Law, P.C.

601 West Randolph Street, Suite 300

Chicago, Illinois 60661

Tel: (312) 561-3030

Fax: (312) 284-4773

(800) DALEY33

mmarcus@fdaleylaw.com

www.fdaleylaw.com

From: Paul Dulberg [pdulberg@comcast.net]

Sent: Sunday, April 13, 2014 8:28 AM

To: Janet Douglass

Cc: Meredith Marcus; Hans Mast

Subject: SSDI update

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The judge left open the record for 30 days for us to add anything to the medical record.

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Thanks again for everything,

Paul

Paul Dulberg

847-497-4250

Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: SSDI update**
Date: December 28, 2016 10:20:18 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: April 13, 2014 at 8:28:30 AM CDT
To: Janet Douglass <Janet@SSDAtty.com>
Cc: "mmarcus@fdaleylaw.com" <mmarcus@fdaleylaw.com>, Hans Mast <hansmast@comcast.net>
Subject: **SSDI update**

Hi Janet,

I had the SSDI hearing last Thursday. It was a learning experience and I am not sure how it went. Much of it I didn't understand. We were missing some of the reports. Particularly anything from Dr. Kujawa showing ongoing care for post traumatic Dystonia in the right forearm and some old reports from Dr. Kohn who was the Dr. who gave me over 100 shots in my neck, shoulders and back for severe muscle spasms after the car accident over a decade ago. Dr. Kohn from Kohn medical group in McHenry, I completely forgot about until the questions about muscle spasms came up in the hearing.

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Thanks again for everything,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Thanks**
Date: December 27, 2016 7:27:27 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: April 14, 2014 at 5:08:43 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Thanks**

Hans,
Sorry for the rants, it's been an emotional roller coaster on my end.
Bringing this to an end would be a big step towards healing for me.
Believe me when I say thanks for all the hard work and get the best deal you can!
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Other council**
Date: December 27, 2016 7:24:09 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: April 27, 2014 at 6:59:18 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Other council**

I hope the dep with dr Kujawa is after the May 8th appointment.
Her assistant Elsie is the one who told me to start logging the issues and Dr. Kujawa hasn't seen any of the video logs I have yet.

Paul Dulberg
847-497-4250
Sent from my iPad

On Apr 22, 2014, at 12:01 PM, Hans Mast <hansmast@comcast.net> wrote:

We have Dr. Kujawas deposition coming up soon. After that dep I will evaluate our options. Thanks for the update.
Hans

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

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Tue, 22 Apr 2014 13:01:02 -0000 (UTC)
Subject: Other council

Hans,

I know I said to just get the best deal you can but what I forgot to ask was if you or your firm had anyone else in mind that would take on my case with the appropriate resources and attention it needs to get a result worth going further.

I don't mind sharing or switching firms if it came with your blessing.

On another note, I have another appointment with Dr. Kujawa on May 8th. Dr. Kujawa's assistant, Elsie, asked me to keep a log on the issues with the forearm. Below is one of the video logs I'm trying to keep for them so they can see the patterns of the burns and muscle cramps so they can better place the injections.

Thanks,
Paul

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Negligent use of chainsaw by homeowner Defendant cut - Jury Verdicts**
Date: December 27, 2016 7:23:30 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: April 28, 2014 at 6:47:43 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Negligent use of chainsaw by homeowner Defendant cut - Jury Verdicts**

Hans,
Ran across this article and to start it is very similar but I cannot see the rest because of the subscription.
Paul

http://www.jvra.com/verdict_trak/article.aspx?id=48597

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Dr. Kujawa**
Date: December 27, 2016 7:21:23 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: May 9, 2014 at 10:38:02 AM CDT
To: Hans Mast <hansmast@comcast.net>
Cc: Meredith Marcus <mmarcus@fdaleylaw.com>
Subject: **Dr. Kujawa**

Hi Hans and Meredith,

I had an appointment with Dr. Kujawa yesterday.
She said the Botox injections will not solve the spastic pains you saw marked on my arm in the video I sent you but it should help with opening and closing my hand so I did another round of injections.

Of coarse I asked, am I stuck with those pains the rest of my life, it's been almost 3 years?

She replied, most likely but that's what the Neurontin/Gabapentin are for and it should help curb some of those pains.

She prescribed Neurontin/Gabapentin for the pains and asked that I report any changes to her and to see her again in another 3 months.

My next appointment is set for August 14th.

Thanks again,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Help**
Date: December 27, 2016 7:19:23 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: May 20, 2014 at 12:30:55 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Help**

Lol, Richard has retired...
Any other suggestions?

Paul Dulberg
847-497-4250
Sent from my iPad

On May 16, 2014, at 9:52 AM, Hans Mast <hansmast@comcast.net> wrote:

Sure..

Richard T. Jones

LAW OFFICES OF RICHARD T. JONES

138 Cass Street

Woodstock, IL 60098

(815) 334-8220

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

From: Paul Dulberg <pdulberg@comcast.net>

To: Hans Mast <hansmast@comcast.net>

Sent: Fri, 16 May 2014 13:23:02 -0000 (UTC)

Subject: Help

Hi Hans,

Know anyone who does bankruptcy?

Thanks,

Paul

Paul Dulberg

847-497-4250

Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Help**
Date: December 27, 2016 7:19:53 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: May 16, 2014 at 8:23:02 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Help**

Hi Hans,
Know anyone who does bankruptcy?
Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Bankruptcy ?**
Date: December 27, 2016 7:18:02 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: June 16, 2014 at 3:46:00 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Bankruptcy ?**

Hi Hans,

I spoke with David Stretch, a bankruptcy lawyer, about possibly going the route of Bankruptcy. He said if I have a pending a suit that it is considered a possible asset and may allow the court to hold off any bankruptcy judgement pending the outcome and that I would only be able to exempt 15,000 before the creditors get their share.

He also said if all I default on is credit cards but keep up on the mortgage and basic needs all that can happen is a judgement will be issued against me and it goes on my credit report and it can be cleared later by filing.

I know my personal financial issues are not your problem but I am to a point for the first time ever that I am stopping all payments to my credit cards and focusing on the house, food and utilities. Or rather I should say my Mom is thanks to the chainsaw.

Does filing bankruptcy make any difference on your end and would it complicate anything?

In your opinion what would be the better route, file bankruptcy now or just default on the credit cards and deal with it later?

I added the contact info for David Stretch below

Thanks,
Paul

**Law Office of
David L. Stretch**
5447 W. Bull Valley Road
McHenry, IL 60050 k

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Dr Kujawa update**
Date: December 27, 2016 7:17:03 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: June 29, 2014 at 2:00:19 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Dr Kujawa update**

Hi Hans,

I spoke with dr. Kujawa's assistant Elsie by phone on Friday. I updated her on how the increased dosages of Neurontin/Gabapentin are having an effect on the burning spasms in my arm. I told her that each week that I increased the dose I was able to get a 75-80% reduction in the amount of burning spasms for approximately 2-1/2 to 3 days tops before I adjusted to the new dosage and the beneficial effects wore off. Unfortunately, I also sleep for 2-1/2 to 3 days each time the dosage is increased.

I am now at the recommended level of 1800mg a day and don't have anymore dosage increases scheduled and it's as if I'm not getting any relief again. She said dr. Kujawa wants to keep me at that dosage until our next office visit.

As far as the Botox injections go, I told her this time it definitely had an effect. My hand is now weaker and I can't even my full coffee cup up straight. She said that's what it's supposed to do and that as it wears off the spasms may get stronger and that we will do another round of injections at the 3 month office visit. She also said that I shouldn't be grabbing anything more than a couple of pounds.

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Dr Kujawa**
Date: December 27, 2016 7:13:55 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: August 14, 2014 at 10:10:07 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Dr Kujawa**

Hi Hans,
Had an appointment with dr Kujawa today. Did not receive Botox but did get another increase in Gabapentin dosage.
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical Expense Report**
Date: December 27, 2016 7:11:40 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: September 23, 2014 at 7:32:09 PM CDT
To: Sheila Quinlan <sheilamquinlan@yahoo.com>
Subject: **Re: Medical Expense Report**

Thank you

Paul Dulberg
847-497-4250
Sent from my iPad

On Sep 22, 2014, at 11:55 AM, Sheila Quinlan <sheilamquinlan@yahoo.com> wrote:

Please find attached a copy of your medical expense report from Hans.

Sheila M. Quinlan
Law Offices of Thomas J. Popovich, P.C.
815.344.3797
815.344.5280 fax

<Medical Expense Report 9-22-14.pdf>

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Bankruptcy**
Date: December 27, 2016 7:13:12 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: September 22, 2014 at 10:02:41 AM CDT
To: "hansmast@comcast.net" <hansmast@comcast.net>
Subject: **Bankruptcy**

Hi Hans,

I have an appointment with David Stretch a bankruptcy lawyer in McHenry on Friday and he is asking for a copy of all of my bills including medical.

David said he could accept a spreadsheet or something from your firm.

Please advise

Thanks,

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Question**
Date: December 27, 2016 7:09:27 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: September 23, 2014 at 10:39:29 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Question**

Has anyone asked your firm to represent them in the event I should move to file a suit against them?

I have to ask because it happened to me with another lawyer a decade or so ago.

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Just received your mailed letter**
Date: December 27, 2016 7:10:43 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: September 23, 2014 at 9:06:46 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Fwd: Just received your mailed letter**

Hans,
if I use a chainsaw and cut you badly who is going to believe me when I say it's not my fault, Hans just fell into it?

Who in their right mind is going to believe me when your pointing your finger at me saying I did it?

Who?

Begin forwarded message:

From: Paul Dulberg <pdulberg@comcast.net>
Date: September 23, 2014 at 8:25:03 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Just received your mailed letter**

First, I'm sorry that I'm not a better witness to help prove David cut me with a chainsaw. I was but a lowly printer/graphic designer my whole life and never asked for anyone's sympathy till now.

Secondly, I'm sorry I must live among a bunch of potential jurors that you don't trust to just do the right thing.

Thirdly, I'm most sorry for agreeing to lend David Gagnon a hand when he needed some help, I had no idea he was going to try and lop it off.

Fourth, I'm sorry you don't feel good about pushing for a trial. I wish whatever mysterious evidence you seek would be shared with me because without a video camera I can only say what I've seen from direct experience. And I guess in this case "me" the victim isn't credible enough but the one wielding a chainsaw that hurt me is.

A few questions from a layman,

How much could a trial actually cost?

What,

\$50,000

\$150,000

Does it even cost as much as a car?

What number?

How much would you hope to get for us in a settlement?

How much could be expected if the trial does proceed and we have a favorable outcome?

Hans, if your heart is not in this I'm sorry

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Sep 23, 2014, at 7:39 PM, Hans Mast <hansmast@comcast.net> wrote:

Hi Paul. My view hasn't changed. I think each time we've talked I've always tried to be open about my reservation to take this

case to trial. I just don't think we have enough evidence to prove our case and to invest the time and cost and preparing for trial and moving to trial just in my mind does not make sense to me. I have to be very realistic about things and honest with my opinion. It doesn't do you any good if I do not feel strongly about the case.

That's the very reason why I wanted to have this discussion. I want to give you the option of finding other counsel at this point if you really want to take the case to trial which I think ultimately will be necessary. I just do not believe strongly that defense counsel will offer much in the way of a settlement. Although I will ask him if he is going to make an offer and maybe that will allow you to make a better judgment on this.

Sent from my iPhone

On Sep 23, 2014, at 7:17 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

Before I proceed,

Why the change of heart?

I mean, last month your response was we are setting a date for trial or something like that but Now it's settle or find new council again.

Paul

Paul Dulberg

847-497-4250

Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Just received your mailed letter**
Date: December 27, 2016 7:11:13 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: September 23, 2014 at 8:25:03 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Just received your mailed letter**

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Paul Dulberg
847-497-4250
Sent from my iPad

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Sent from my iPhone

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Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Just received your mailed letter**
Date: December 27, 2016 7:12:32 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: September 23, 2014 at 7:17:07 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Just received your mailed letter**

Before I proceed,
Why the change of heart?
I mean, last month your response was we are setting a date for trial or something like that but Now it's settle or find new council again.
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Call me**
Date: December 27, 2016 6:56:47 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: October 2, 2014 at 11:44:52 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Call me**

Hans,
Just so you know, I did contact Randal Baudin's office, spoke with whoever answers the phone and they haven't called back.
Paul

On Sep 24, 2014, at 10:52 AM, Hans Mast <hansmast@comcast.net> wrote:

Randal Baudin

LAW OFFICES OF RANDAL BAUDIN

2100 Huntington Drive North
Suite C
Algonquin, IL 60102

Phone: 847.658.5295
Fax: 847.658.5015

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

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Wed, 24 Sep 2014 13:32:15 -0000 (UTC)
Subject: Call me
Hans,
My stomach is in knots again over this please call me
Paul
Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Call me**
Date: December 27, 2016 7:08:53 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: September 24, 2014 at 8:32:15 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Call me**

Hans,
My stomach is in knots again over this please call me
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: Fwd:
Date: December 27, 2016 7:03:23 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: September 26, 2014 at 9:03:02 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: Fwd:

Oh and add 12 weeks paid vacation with another 12 weeks of paid sick leave per year to cover the 50% of the year my conditions get in the way of doing the job.

Lol

I'm so sick of this legal crap. None of it really helps if it hurts to use your hands forever.

Paul Dulberg
847-497-4250
Sent from my iPad

Begin forwarded message:

From: Paul Dulberg <pdulberg@comcast.net>
Date: September 26, 2014 at 8:24:22 PM CDT
To: Hans Mast <hansmast@comcast.net>

One last evil thought while I'm losing everything.

Do me a favor Hans,

Tell Allstate I'd settle for a mere comfy vp position in their firm with a meager 75,000 dollar a year salary that always increases with inflation contracted over a 20 year period with me doing nothing but finding ways to increase David Gagnons premiums forever and see how they reply.

This way there is no fight over whether their client neglected to tell me what the hell he was going to do with that chainsaw.

Videotape their response and send it to me.

I don't care if your buddies or not just do it and make me smile

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Bad night**
Date: December 27, 2016 7:07:16 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: September 26, 2014 at 6:32:40 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Bad night**

Hans,

Last evening I was in the hospital with the most severe migraine I've ever had.

This morning I filed for bankruptcy with David Stretch.

This afternoon I spent with my regular physician Dr Zaide doing a follow up from yesterday.

And right now, I have to email you. All when I still have a slight residual headache and should be in bed.

At first I thought the migraine was brought on by the medications I'm taking but it wasn't, it was brought on after our discussions. Now I can't prove that but it seems pretty obvious to me. Joke no pun intended there!

That migraine made me realize I need the stress of this situation over with. All the stress on top of losing everything is too much and I'd rather live than die from it all before my body does something worse.

My body is not reacting well and the migraines are getting more frequent and worse. Have you ever vomited at the same time as defecating while being in some of the most excruciating pain in your life?

If not, neither did I till the chainsaw went through my arm. That's when the migraines became more frequent, stronger and faster coming on. And now for the first time during the day.

Ever since I awoke this morning, all I can I think is the stress of it all is killing me more and more as the reality sets in and I just can't afford to care about it anymore.

My health means more than some lawsuits and the lure of money.

All because some idiot named David Gagnon forgot to tell me to move out of the way and he can't seem to admit it.

Yes, after reading his deposition and hearing it was my fault I was pissed.

In my anger I suspected all sorts of things. Including it being intentional especially after my discussions at his home only trying to get his homeowners policy number and him wanting money and threatening me for it.

Yes, my arm and elbow were hurt from his stupidity irregardless if some dr can link the two together or not.

Yes, there will be ongoing medical as a result of all this because it still hurts and doesn't work right.

Yes, I am now disabled irregardless of what SSDI appeal goes because of this.

Yes, I understand I'm screwed because of a system that allows one person to hurt another and even after a trial and judgement entered all they have to do is go file for bankruptcy in the same courthouse on the same day.

Yes, it just took me almost an hour just to type this.

Yes, yes, yes...

but none of it matters anymore!

Bottom line Hans... Do the best you can with what you got, I've got nothing more to lose or give. I need it all to just go away.

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Bankruptcy**
Date: December 27, 2016 7:01:14 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: September 27, 2014 at 2:23:57 PM CDT
To: David Stretch <stretchlaw@gmail.com>
Subject: **Bankruptcy**

Hi David,

Is it possible to add the 30 grand I owe back to SSDI to the bankruptcy or am I stuck having my tax return confiscated by the federal govt. till it's all paid back?

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Allstate**
Date: December 27, 2016 7:01:51 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: September 27, 2014 at 2:20:27 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Allstate**

I want the monies I owe back to SSDI for being found disabled because of David's crap.
I owe SSDI another 30 grand so far because of this crap
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Start fresh today**
Date: December 27, 2016 7:00:38 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: September 29, 2014 at 1:33:00 PM CDT
To: David Stretch <stretchlaw@gmail.com>
Subject: **Start fresh today**

Hi David,

The online class keeps asking for an atty code

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Lean expired dynamic hand therapy**
Date: December 27, 2016 6:58:23 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: October 2, 2014 at 10:14:34 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Lean expired dynamic hand therapy**

Dulberg

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Lean expired dynamic hand therapy**
Date: December 27, 2016 6:58:52 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: October 2, 2014 at 9:46:27 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Lean expired dynamic hand therapy**

Sorry, They just called me this morning so there is no copy.

Paul

On Oct 2, 2014, at 9:43 AM, Hans Mast <hansmast@comcast.net> wrote:

Paul I'm going to try to Settle your case. No guarantees. But until the case could settle there's nothing I can do about the balances. Can you give me a copy of that bill.

Sent from my iPhone

On Oct 2, 2014, at 9:19 AM, Paul Dulberg <pdulberg@comcast.net> wrote:

Hans,

Apparently Dynamic Hand Therapy has a lean that expired.

It's for \$23,900.00 and they said they will give me a 30% discount if I pay within the next few days or they could take me to trial over it.

Colleen with their corporate office said she contacted you on Aug. 6th about this.

Her number is 815-986-1564

Please advise,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Lean expired dynamic hand therapy**
Date: December 27, 2016 6:59:38 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: October 2, 2014 at 9:31:00 AM CDT
To: David Stretch <stretchlaw@gmail.com>
Subject: **Fwd: Lean expired dynamic hand therapy**

Hi David,

Please read the letter below.

Does bankruptcy protect me and my house from medical loans that expire?

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

Begin forwarded message:

From: Paul Dulberg <pdulberg@comcast.net>
Date: October 2, 2014 at 9:19:08 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Lean expired dynamic hand therapy**

Hans,

Apparently Dynamic Hand Therapy has a lean that expired.
It's for \$23,900.00 and they said they will give me a 30% discount if I pay within the next few days or they could take me to trial over it.

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Her number is 815-986-1564

Please advise,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Lean expired dynamic hand therapy**
Date: December 27, 2016 7:00:04 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: October 2, 2014 at 9:19:08 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Lean expired dynamic hand therapy**

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Her number is 815-986-1564

Please advise,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Elbow**
Date: December 27, 2016 6:56:06 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: October 4, 2014 at 3:21:42 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Elbow**

Hans,
If the elbow is the big issue then I'll pay for that part.
I just don't care anymore and don't know how to separate it from the rest.
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical bills**
Date: December 27, 2016 6:48:04 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: October 6, 2014 at 3:17:55 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Medical bills**

Can I submit dynamic hand bills to Medicaid on my own?

Paul Dulberg
847-497-4250
Sent from my iPad

On Oct 6, 2014, at 2:29 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

Won't they be better off if they resign a new lean against the suit rather than wait 30 years for me to sell this house?

I know... Patients right?

Paul Dulberg
847-497-4250
Sent from my iPad

On Oct 6, 2014, at 1:25 PM, Hans Mast <hansmast@comcast.net> wrote:

If they don't accept your insurance theres not much you can do. Just be patient. Let's see what transpires.

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

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Mon, 06 Oct 2014 17:59:29 -0000 (UTC)
Subject: Re: Medical bills
Perhaps you can use the word reimburse, pay, etc...
Paul Dulberg
847-497-4250
Sent from my iPad

On Oct 6, 2014, at 12:45 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

I offered dynamic hand my medical insurance to try and compensate them for their services.

As of this morning They refused it!

Paul Dulberg
847-497-4250
Sent from my iPad

On Oct 6, 2014, at 12:40 PM, Hans Mast <hansmast@comcast.net> wrote:

what do you mean you tried to compensate them?

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

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Mon, 06 Oct 2014 16:39:04 -0000 (UTC)
Subject: Re: Medical bills
Hans,
Please Correct me if I am wrong here...

I just tried to compensate dynamic hand therapy and they denied payment because it is not the insurance carrier they

prefer.

Do I need to get another kind of lawyer to represent me for this?

If so, what kind and who?

Paul

On Oct 6, 2014, at 11:29 AM, Hans Mast <hansmast@comcast.net> wrote:

Whether the providers must submit to Medicare is an issue that must be decided between you two. If you have Medicare and they agree to treat you then they have to use Medicare. If they don't agree to use Medicare, there's really no way to compel them.

I can send a List of Providers to you. We don't need the Medicaid info unless they end up paying your bills.

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

From: Paul Dulberg <pdulberg@comcast.net>

To: Hans Mast <hansmast@comcast.net>

Sent: Mon, 06 Oct 2014 16:17:41 -0000 (UTC)

Subject: Re: Medical bills

Hans,

Any chance I can get a list of all the medical providers in my case so I can turn in my insurance info to each of them?

Also, I spoke with Rene at dynamic hand therapy and tried to give her my insurance info. she informed me that they only take Medicaid once and a while and probably won't in my case. She is having someone named Colleen call me tomorrow about it.

Can medical providers actually deny my insurance after they already treated me knowing before hand that with my injury I was most likely going to end up disabled and on the states medical insurance?

Also, does it help to give you or your secretary a copy of the Medicaid card?

Thanks,

Paul

Paul Dulberg

847-497-4250

Sent from my iPad

On Oct 6, 2014, at 10:15 AM, Hans Mast <hansmast@comcast.net> wrote:

Hi Paul. You need to work with your providers to have them submit your bills to Medicaid. Some do not take Medicaid, while others probably prefer to try to get 100% of the bill paid from your personal injury case. So you have to explain to them the problems with the case and that you prefer to have the bill submitted to health insurance for payment.

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

From: Paul Dulberg <pdulberg@comcast.net>

To: Hans Mast <hansmast@comcast.net>

Sent: Sun, 05 Oct 2014 23:11:44 -0000 (UTC)

Subject: Medical bills

Hans,

Since I was determined disabled by the SSDI judge during the time of treatment does that entitle me to Medicaid or Medicare?

If so can't they help to pay the past due medical bills during that time?

Paul

Paul Dulberg

847-497-4250

Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
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Date: December 27, 2016 6:48:38 PM CST
To: paul_dulberg@comcast.net

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To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: October 6, 2014 at 1:58:06 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Medical bills**

Just so you know...

Last week when Coleen from dynamic hand called to inform me that the lean against the suit expired, I offered to make payments and that was also refused.

So technically this is the second time they refused compensation.

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Oct 6, 2014, at 12:59 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

Perhaps you can use the word reimburse, pay, etc...

Paul Dulberg
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If so can't they help to pay the past due medical bills during that time?

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Paul Dulberg

847-497-4250

Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical bills**
Date: December 27, 2016 6:50:02 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: October 6, 2014 at 12:59:29 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Medical bills**

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Paul Dulberg
847-497-4250
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If so can't they help to pay the past due medical bills during that time?

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847-497-4250
Sent from my iPad

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Subject: **Fwd: Medical bills**
Date: December 27, 2016 6:52:00 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: October 6, 2014 at 12:45:14 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Medical bills**

I offered dynamic hand my medical insurance to try and compensate them for their services.

As of this morning They refused it!

Paul Dulberg
847-497-4250
Sent from my iPad

On Oct 6, 2014, at 12:40 PM, Hans Mast <hansmast@comcast.net> wrote:

what do you mean you tried to compensate them?

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

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Mon, 06 Oct 2014 16:39:04 -0000 (UTC)
Subject: Re: Medical bills

Hans,

Please Correct me if I am wrong here...

I just tried to compensate dynamic hand therapy and they denied payment because it is not the insurance carrier they prefer.

Do I need to get another kind of lawyer to represent me for this?

If so, what kind and who?

Paul

On Oct 6, 2014, at 11:29 AM, Hans Mast <hansmast@comcast.net> wrote:

Whether the providers must submit to Medicare is an issue that must be decided between you two. If you have Medicare and they agree to treat you then they have to use Medicare. If they don't agree to use Medicare, there's really no way to compel them.

I can send a List of Providers to you. We don't need the Medicaid info unless they end up paying your bills.

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

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Mon, 06 Oct 2014 16:17:41 -0000 (UTC)
Subject: Re: Medical bills

Hans,

Any chance I can get a list of all the medical providers in my case so I can turn in my insurance info to each of them?

Also, I spoke with Rene at dynamic hand therapy and tried to give her my insurance info. she informed me that they only take Medicaid once and a while and probably won't in my case. She is having someone named Colleen call me tomorrow about it.

Can medical providers actually deny my insurance after they already treated me knowing before hand that with my injury I was most likely going to end up disabled and on the states medical insurance?

Also, does it help to give you or your secretary a copy of the Medicaid card?

Thanks,

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Oct 6, 2014, at 10:15 AM, Hans Mast <hansmast@comcast.net> wrote:

Hi Paul. You need to work with your providers to have them submit your bills to Medicaid. Some do not take Medicaid, while others probably prefer to try to get 100% of the bill paid from your personal injury case. So you have to explain to them the problems with the case and that you prefer to have the bill submitted to health insurance for payment.

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

From: Paul Dulberg <pdulberg@comcast.net>

To: Hans Mast <hansmast@comcast.net>

Sent: Sun, 05 Oct 2014 23:11:44 -0000 (UTC)

Subject: Medical bills

Hans,

Since I was determined disabled by the SSDI judge during the time of treatment does that entitle me to Medicaid or Medicare?

If so can't they help to pay the past due medical bills during that time?

Paul

Paul Dulberg

847-497-4250

Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical bills**
Date: December 27, 2016 6:52:54 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: October 6, 2014 at 12:02:31 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Medical bills**

Honestly, what can dynamic hand therapy hope to get from me if they don't accept the insurance?

The only asset I have is a home that is probably underwater.

If all they can do is put a lien on it their better off taking what the insurance offers.

What legally can be done to me?

Paul

From: Paul Dulberg <pdulberg@comcast.net>
Date: October 6, 2014 at 11:39:04 AM CDT
To: Hans Mast <hansmast@comcast.net>
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Paul
Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: SSDI judgement**
Date: December 27, 2016 6:54:55 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: October 5, 2014 at 6:14:44 PM CDT
To: Hans Mast <hansmast@comcast.net>, Meredith Marcus <mmarcus@fdaleylaw.com>
Subject: **SSDI judgement**

Hi Meredith,

Curious if I am entitled to Medicare or Medicaid during the period the judge determined I was disabled?
If so where do I need to go to get help with the medical bills during that period?
Thanks so much,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical bills**
Date: December 27, 2016 6:55:35 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: October 5, 2014 at 6:11:44 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Medical bills**

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If so can't they help to pay the past due medical bills during that time?

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: define compensate - Google Search**
Date: December 27, 2016 6:51:19 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: October 6, 2014 at 12:56:32 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **define compensate - Google Search**

https://www.google.com/?gws_rd=ssl#q=define+compensate

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical bills**
Date: December 27, 2016 6:46:13 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: October 7, 2014 at 10:48:35 AM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Medical bills**

Hans,

Coleen with dynamic hand therapy just called me and she absolutely refused Medicaid insurance. She said she has been instructed to remove my account from her books. She is going to consider payments and get back to me.

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Dynamic Hand Therapy**
Date: December 27, 2016 6:45:31 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: October 8, 2014 at 1:28:35 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Dynamic Hand Therapy**

Hi Hans,

Coleen at dynamic hand therapy called with a proposal.
She is going to write up an agreement.
It will be \$25.00 per month till the SSDI judgement is finished.
After that it will increase to \$100 per month if the SSDI judgement is favorable or stay at \$25 per month if it isn't.
Payments end once your case against David Gagnon is settled and they receive their share of the settlement.

This keeps it out of collections.

Does this sound fair?

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical bills**
Date: December 27, 2016 6:43:40 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: October 22, 2014 at 3:46:54 PM CDT
To: Hans Mast <hansmast@comcast.net>
Subject: **Medical bills**

On Oct 22, 2014, at 3:45 PM, Paul Dulberg <pdulberg@me.com> wrote:

Hi Hans,
Never heard back from you on the agreement with dynamic hand therapy.
I went ahead and signed a payment plan with them until a settlement is reached.
Today I spoke with associated neurology and am going to start payments with them as well.
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Dr. Kujawa visit**
Date: December 27, 2016 6:44:10 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: November 6, 2014 at 6:45:16 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Dr. Kujawa visit**

Hans,
Met with Dr. Kujawa today. Nothing new... Same meds etc...
Will meet with her again in about 4 months.
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: SSDI appeal update**
Date: December 27, 2016 6:42:47 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: December 1, 2014 at 12:47:40 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **SSDI appeal update**

Hi Hans,

I heard from Meredith (my lawyer for SSDI) about when I should expect a response from SSDI. Apparently the SSDI courts are understaffed and it may take up to a year or a little longer from the date the appeal was filed.

I'm unsure of the exact date it was filed but the last hearing was in April or May and I believe the appeal was filed just after that so it may be a while before I hear anything and then it all depends if it's dismissed and I actually have to sue or its remanded back to the lower court for reconsideration.

Either route it's going to be many months before I know anything more.

At my last visit with Dr. Kujawa she said she is filing my injury as permanent but I'm not sure if that is admissible to the appeal at this point. Meredith is working on that.

On another note, I called Randal Baudin's office again and am waiting to hear back again.

Thanks for everything,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Associated Neurology**
Date: December 27, 2016 6:31:34 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: December 8, 2014 at 6:00:50 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Associated Neurology**

Hans,

At first my goal was to get my medical paid for...
That's changed because it's turned out worse than I thought...
Now it's simply to get as much as we can and move on with my life...

What are your goals in this case?

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Dec 8, 2014, at 3:37 PM, Hans Mast <hansmast@comcast.net> wrote:

Paul, I don't see us having the same goals in this case. I think you should search for a different atty. Let me know if you want another referral. Thanks Hans

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

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Mon, 08 Dec 2014 20:14:34 -0000 (UTC)
Subject: Fwd: Associated Neurology
John Choyinski is sitting here and just told me that David Gagnon has been moving everything he owns into his mothers and two sisters names so he can't lose anything.
Paul Dulberg
847-497-4250
Sent from my iPad

Begin forwarded message:

From: Paul Dulberg <pdulberg@comcast.net>
Date: December 8, 2014 at 2:01:43 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Fwd: Associated Neurology**

I just found out from John Choyinski that David Gagnon took apart the mustang. It's down to the frame. John said that David did that to make sure he doesn't lose it and won't put it back together till the mess he caused with me is finished.

I'd really like to nail this asshole to the wall Hans. I need help to do it.

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From: Paul Dulberg <pdulberg@comcast.net>
Date: December 8, 2014 at 1:16:48 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Fwd: Associated Neurology**

Oh, I do know he has a fully restored mustang that he claimed is worth over 100 grand.
He has something to lose.

Paul
Paul Dulberg
847-497-4250
Sent from my iPad

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From: Paul Dulberg <pdulberg@comcast.net>
Date: December 8, 2014 at 1:06:53 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: Re: Associated Neurology

Hans,
Your risk...

I just had to file bankruptcy because of that incident 3-1/2 years ago. I could no longer make all the payments to my creditors. I also have a disability suit because of it.

I don't care about a settlement unless it's enough to drag David Gagnon through bankruptcy for his idiotic use of a chainsaw and made up story under oath. Gagnon sure showed his true colors when he was deposed, he just isn't a standup guy at all.

Either way it goes, (settlement or trial) I'm not going to make anything near what I've already lost or what my future losses are going to be so it just doesn't matter.

The only thing that would be remotely satisfying is knowing that David Gagnon had to go through a settlement or trial and lose, then find himself actually having to face bankruptcy.

I can only hope he has enough assets that it actually hurts.

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Dec 8, 2014, at 9:42 AM, Hans Mast <hansmast@comcast.net> wrote:

Paul, thanks for the update. Im not sure what you mean by liens expiring. As long as your case is pending, the liens will apply to any recovery.

As for an atty, my thoughts are the same. I can try to see if they want to give us a settlement offer, but I don't think we will want to take the case to trial given the extreme risk versus the time and expense in trying the case.

Thanks, Hans

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From: Paul Dulberg <pdulberg@comcast.net>

To: Hans Mast <hansmast@comcast.net>

Sent: Mon, 08 Dec 2014 15:31:29 -0000 (UTC)

Subject: Associated Neurology

Hi Hans,

Just got a call from associated neurology because of the bankruptcy notice they received.

Tried to explain that the loans on the lawsuit expired after 3 years and I really don't have any choice.

They said they never heard of such a thing and are looking into the loan issue and will get back to me.

On another note, Baudin's firm must not be interested because they never called me.

Do I need to find a new firm or what?

Thanks,

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847-497-4250

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From: Paul Dulberg <pdulberg@comcast.net>
Date: December 8, 2014 at 3:45:04 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Associated Neurology**

I'm sorry for the rants...
I'm just angry
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To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
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To: Hans Mast <hansmast@comcast.net>
Subject: **Fwd: Associated Neurology**

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I don't care about a settlement unless it's enough to drag David Gagnon through bankruptcy for his idiotic use of a chainsaw and made up story under oath. Gagnon sure showed his true colors when he was deposed, he just isn't a standup guy at all.

Either way it goes, (settlement or trial) I'm not going to make anything near what I've already lost or what my future losses are going to be so it just doesn't matter.

The only thing that would be remotely satisfying is knowing that David Gagnon had to go through a settlement or trial and lose, then find himself actually having to face bankruptcy.

I can only hope he has enough assets that it actually hurts.

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Dec 8, 2014, at 9:42 AM, Hans Mast <hansmast@comcast.net> wrote:

Paul, thanks for the update. Im not sure what you mean by liens expiring. As long as your case is pending, the liens will apply to any recovery.

As for an atty, my thoughts are the same. I can try to see if they want to give us a settlement offer, but I don't think we will want to take the case to trial given the extreme risk versus the time and expense in trying the case.

Thanks, Hans

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

From: Paul Dulberg <pdulberg@comcast.net>
To: Hans Mast <hansmast@comcast.net>
Sent: Mon, 08 Dec 2014 15:31:29 -0000 (UTC)
Subject: Associated Neurology

Hi Hans,

Just got a call from associated neurology because of the bankruptcy notice they received.

Tried to explain that the leans on the lawsuit expired after 3 years and I really don't have any choice.

They said they never heard of such a thing and are looking into the lean issue and will get back to me.

On another note, Baudin's firm must not be interested because they never called me.

Do I need to find a new firm or what?

Thanks,

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Associated Neurology**
Date: December 27, 2016 6:35:09 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: December 8, 2014 at 2:01:43 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Fwd: Associated Neurology**

I just found out from John Choyinski that David Gagnon took apart the mustang. It's down to the frame. John said that David did that to make sure he doesn't lose it and won't put it back together till the mess he caused with me is finished.

I'd really like to nail this asshole to the wall Hans. I need help to do it.

Paul Dulberg
847-497-4250
Sent from my iPad

Begin forwarded message:

From: Paul Dulberg <pdulberg@comcast.net>
Date: December 8, 2014 at 1:16:48 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Fwd: Associated Neurology**

Oh, I do know he has a fully restored mustang that he claimed is worth over 100 grand.

He has something to lose.

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

Begin forwarded message:

From: Paul Dulberg <pdulberg@comcast.net>
Date: December 8, 2014 at 1:06:53 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Associated Neurology**

Hans,
Your risk...

I just had to file bankruptcy because of that incident 3-1/2 years ago. I could no longer make all the payments to my creditors. I also have a disability suit because of it.

I don't care about a settlement unless it's enough to drag David Gagnon through bankruptcy for his idiotic use of a chainsaw and made up story under oath. Gagnon sure showed his true colors when he was deposed, he just isn't a standup guy at all.

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Sent from my iPad

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To: Hans Mast <hansmast@comcast.net>

Sent: Mon, 08 Dec 2014 15:31:29 -0000 (UTC)

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Thanks,

Paul

Paul Dulberg

847-497-4250

Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Associated Neurology**
Date: December 27, 2016 6:38:22 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: December 8, 2014 at 2:01:43 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Fwd: Associated Neurology**

I just found out from John Choyinski that David Gagnon took apart the mustang. It's down to the frame. John said that David did that to make sure he doesn't lose it and won't put it back together till the mess he caused with me is finished.

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Paul

Paul Dulberg
847-497-4250
Sent from my iPad

Begin forwarded message:

From: Paul Dulberg <pdulberg@comcast.net>
Date: December 8, 2014 at 1:06:53 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Associated Neurology**

Hans,
Your risk...

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847-497-4250
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Thanks, Hans

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To: Hans Mast <hansmast@comcast.net>

Sent: Mon, 08 Dec 2014 15:31:29 -0000 (UTC)

Subject: Associated Neurology

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They said they never heard of such a thing and are looking into the lean issue and will get back to me.

On another note, Baudin's firm must not be interested because they never called me.

Do I need to find a new firm or what?

Thanks,

Paul

Paul Dulberg

847-497-4250

Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Associated Neurology**
Date: December 27, 2016 6:40:35 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: December 8, 2014 at 9:45:25 AM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Re: Associated Neurology**

Hans,

I need to go back through emails but off the top of my head I believe it was you who informed me that medical liens expire after 3 years in Illinois

Paul Dulberg
847-497-4250
Sent from my iPad

On Dec 8, 2014, at 9:42 AM, Hans Mast <hansmast@comcast.net> wrote:

Paul, thanks for the update. Im not sure what you mean by liens expiring. As long as your case is pending, the liens will apply to any recovery.

As for an atty, my thoughts are the same. I can try to see if they want to give us a settlement offer, but I don't think we will want to take the case to trial given the extreme risk versus the time and expense in trying the case.

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To: Hans Mast <hansmast@comcast.net>
Sent: Mon, 08 Dec 2014 15:31:29 -0000 (UTC)
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847-497-4250

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Subject: **Fwd: Associated Neurology**
Date: December 27, 2016 6:41:09 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: December 8, 2014 at 9:31:29 AM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Associated Neurology**

Hi Hans,

Just got a call from associated neurology because of the bankruptcy notice they received.

Tried to explain that the loans on the lawsuit expired after 3 years and I really don't have any choice.

They said they never heard of such a thing and are looking into the loan issue and will get back to me.

On another note, Baudin's firm must not be interested because they never called me.

Do I need to find a new firm or what?

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: Fwd: New counsel
Date: December 27, 2016 6:24:56 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: December 19, 2014 at 12:43:45 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: Fwd: New counsel

I have to wonder...

Is it the fact that David Gagnon doesn't have a bigger insurance policy?

Or perhaps that I didn't lose my arm?

What is it that isn't good enough for your firm that they would actually drop a client they chose to represent?

I'm betting in the end it's all about the amount of money your firm can make off of my injuries because I've done nothing to exaggerate or hide anything.

Have a merry Xmas, now I'm late to see a dr and my arm muscles are in spasm from trying to type this wasted email as fast as I can.
Paul

On another note,

David Gagnon already received more than any lawsuit will bring me...
If this was someone I didn't know...
I'd find out how to put the guy in prison for as many years as I could.

No one should be allowed to use a chainsaw like he did and get away with it!

The gift I gave David by providing him with the benefit of the doubt has turned out priceless for him...

What I received is a life sentence even if I win some lawsuit...
What can I do with the money, pay someone else to do the things I would have been able to do myself if this didn't happen?
What part of life makes that appealing?
And how long will that last?

I went from being a doer with some potential to being a watcher and beggar. There is nothing that can change that...

Neither David nor his insurance policy can fix any of this.

Your position of fear in this case is appalling.

Oh and one more thing...
Those dr's, vocational experts and federal judge were all in agreement that I was disabled and already gave me a partially favorable judgement.

I believe the only outstanding question was whether the ongoing treatment of injections was going to make it better or not?

Since then, The injections only made me weaker in a different part of the arm for a period and had no positive effect and now I just have to wait and see.

Ending up on disability and having to take meds 3x a day is not a choice or outcome I wanted. Nor did I want to have to fend off an incoming chainsaw or go through a couple of surgeries. I wouldn't wish this on anyone

All I wanted was to heal enough to go back to work. I really did try.
I used to make more money in a few months then I'm going to make all year now. That's no exaggeration.

Oh and that stupid statement I heard you say in the past that part of my injuries were to distal from the cut...

I dare you to Try fending off a chainsaw that's violently cutting into you unexpectedly and survive without any other issue other than where the chainsaw cut you.

And if during that event you should twist an ankle, hit your head, another part of the body or anything else from trying to save yourself... Remember it's too distal from the wound so you lose...

That is absolutely retarded to think that my elbow was too distal from the cut... Think about what it takes to fend off an aggressive chainsaw cutting into you and then tell me if any other smaller, at first unnoticed injury is too distal to be real?

I'm tired of this crap

Talk with you after Monday,
Paul

Oops, hit send accidentally. . Another issue from a shaky muscle in my forearm...

Hans,

What and where does "you weren't hurt that bad" mean or come from?

It was a deep laceration from a chainsaw and I'm only hurt as bad as it is and that's it.
I obviously have long term issues with/from the injury so no exaggeration is needed on my part.

Whether or not it's considered disabling is the only real question and that is being decided for us at the federal level with other dr's and vocational experts that I didn't pick.

All that I hope for is that I'm treated by those like you as you would want to be treated.

Thanks for the honesty and I will get back with you after Monday.
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Dec 19, 2014, at 10:11 AM, Hans Mast <hansmast@comcast.net> wrote:

Here's the deal...they are going to be reviewing the case with a doctor. The doctor will probably say you weren't hurt that bad. So, even if they concede that Mr. Gagnon was at fault, they will likely not offer much on the case. How much, I don't know. But I'm not interested in trying the case. I think it would be very difficult to win. So unless you want to work out a settlement, I think you should consider other counsel. It's tough to make these decisions. I know it makes it tough on you.

But these decisions are the reality in working on such cases sometimes.

The good news is that you have a chance to recover in a jury trial. It would be tough, but there is a chance that the jury will believe you. But it will take some time and expense to take the case to trial. If the jury believes your specialist, the damages could be good for you. But there are a lot of "ifs" and I'm not prepared to undertake the risks at this point.

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

From: Paul Dulberg <pdulberg@comcast.net>

To: Hans Mast <hansmast@comcast.net>

Sent: Fri, 19 Dec 2014 15:46:43 -0000 (UTC)

Subject: New counsel

Morning Hans,

I have a meeting with Randal Baudin's office on Monday.

Do you really wish that I find new counsel?

Paul

Paul Dulberg
847-497-4250

||| Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: New counsel**
Date: December 27, 2016 6:29:36 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: December 19, 2014 at 12:21:14 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Fwd: New counsel**

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Sent from my iPad

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Paul

Paul Dulberg

847-497-4250

Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: New counsel**
Date: December 27, 2016 6:30:41 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: December 19, 2014 at 9:46:43 AM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **New counsel**

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Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Independent medical examination**
Date: December 27, 2016 6:22:07 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: December 20, 2014 at 7:44:11 AM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Independent medical examination**

Hans,

Would giving David Gagnon and his insurance Allstate the chance to do an independent medical examination of my impaired arm help any?

This could diffuse any idea that I'm exaggerating or that they would even want to try to claim that it's not as bad as I make it out to be.

Who knows, perhaps the 7th dr to evaluate the injury knows something that the others didn't and they could actually improve my condition

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Thank you**
Date: December 27, 2016 6:20:38 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: January 9, 2015 at 12:45:30 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Thank you**

Hans,
Thanks for getting everything the bankruptcy judge needs.
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Delivery status notification**
Date: December 29, 2016 9:05:10 AM CST
To: paul_dulberg@comcast.net

From: Mail Delivery System <mailer-daemon@comcast.net>
Date: January 9, 2015 at 12:45:29 PM CST
To: pdulberg@comcast.net
Subject: **Delivery status notification**

This is an automatically generated Delivery Status Notification.

Delivery to the following recipients was aborted after 0 second(s):

* hansmast@comcast.net

Reporting-MTA: dns; reszmta-ch2-04v.sys.comcast.net [69.252.207.68]
Received-From-MTA: dns; resomta-ch2-10v.sys.comcast.net [69.252.207.106]
Arrival-Date: Fri, 09 Jan 2015 18:45:29 +0000

Final-recipient: rfc822; hansmast@comcast.net
Action: failed
Status: 5.1.1
Diagnostic-Code: smtp; 550 5.1.1 No such user here
Last-attempt-Date: Fri, 09 Jan 2015 18:45:29 +0000

Received: from [IPv6:2601:d:6a80:ff1:7479:f138:26a3:186] ([IPv6:2601:d:6a80:ff1:7479:f138:26a3:186]) by resomta-ch2-10v.sys.comcast.net with comcast id duLU1p00s3FKfEp01ulVed; Fri, 09 Jan 2015 18:45:29 +0000 X-CAA-SPAM: 0 X-Authority-Analysis: v=2.1 cv=WcyCaiRX c=1 sm=1 tr=0 a=kj9zAlcOel0A:10 a=C_IRinGWAAAA:8 a=g5LwSJ285O_RKKuVzkoA:9 a=CjulK1q_8ugA:10 a=QNs_r_9RqKIA:10 a=DehUvbS2nl0A:10 a=zQgg050mtPYA:10 a=gG7ACNDEj1QA:10 a=22nOKrcjyQoA:10 a=VkiFLWbzrdQA:10 Subject: Thank you From: Paul Dulberg Content-Type: text/plain; charset=us-ascii X-Mailer: iPad Mail (12B440) Message-Id: <5EB06866-2962-4842-9424-56336D688E98@comcast.net> Date: Fri, 9 Jan 2015 12:45:30 -0600 To: Hans Mast Content-Transfer-Encoding: 7bit Mime-Version: 1.0 (1.0)

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Band?**
Date: December 27, 2016 6:19:34 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: January 30, 2015 at 3:56:26 PM CST
To: Hans Mast <hansmast@att.net>
Subject: **Band?**

Hans,
Your in a band?
Cool
I gotta see this...
Who owns the gambler these days?
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Not business**
Date: December 27, 2016 6:20:07 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: January 30, 2015 at 3:20:41 PM CST
To: Hans Mast <hansmast@comcast.net>
Subject: **Not business**

Hi Hans,
You play in a band?
The invite says its at the gambler.
Who owns that place these days?
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Delivery status notification**
Date: December 29, 2016 9:03:37 AM CST
To: paul_dulberg@comcast.net

From: Mail Delivery System <mailer-daemon@comcast.net>
Date: January 30, 2015 at 3:20:39 PM CST
To: pdulberg@comcast.net
Subject: **Delivery status notification**

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Delivery to the following recipients was aborted after 0 second(s):

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Received-From-MTA: dns; resomta-ch2-13v.sys.comcast.net [69.252.207.109]
Arrival-Date: Fri, 30 Jan 2015 21:20:39 +0000

Final-recipient: rfc822; hansmast@comcast.net
Action: failed
Status: 5.1.1
Diagnostic-Code: smtp; 550 5.1.1 No such user here
Last-attempt-Date: Fri, 30 Jan 2015 21:20:39 +0000

Received: from [IPv6:2601:d:6a80:ff1:c47a:d0bc:a12b:bdb2] ([IPv6:2601:d:6a80:ff1:c47a:d0bc:a12b:bdb2]) by resomta-ch2-13v.sys.comcast.net with comcast id mMLf1p00E5Jdz9901MLfp9; Fri, 30 Jan 2015 21:20:39 +0000 X-CAA-SPAM: 0 X-Authority-Analysis: v=2.1 cv=RckeCjdv c=1 sm=1 tr=0 a=kj9zAlcOel0A:10 a=C_IRinGWAAAA:8 a=6ROYA3k7bTtZ8VA-MVoA:9 a=CjulK1q_8ugA:10 a=QNs_r_9RqKIA:10 a=DehUvbS2nl0A:10 a=wJpbwnC9vPsA:10 a=4B2pj95iVtIA:10 a=qljwiZXUcs0A:10 a=sum0VfoA1QYA:10 Subject: Not business From: Paul Dulberg Content-Type: text/plain; charset=us-ascii X-Mailer: iPad Mail (12B466) Message-Id: <9BDD2A60-3D6E-4EB1-9F63-28E0615CA649@comcast.net> Date: Fri, 30 Jan 2015 15:20:41 -0600 To: Hans Mast Content-Transfer-Encoding: 7bit Mime-Version: 1.0 (1.0)

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Pre-trial settlement**
Date: December 27, 2016 6:16:49 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: February 15, 2015 at 4:04:11 PM CST
To: HANS MAST <hansmast@att.net>
Subject: **Re: Pre-trial settlement**

It's Sunday and I haven't seen it.

Paul Dulberg
847-497-4250
Sent from my iPad

On Feb 9, 2015, at 12:42 PM, HANS MAST <hansmast@att.net> wrote:

I sent you a copy of our Memo of the Case....if you don't get it this week let me know..

On Monday, February 9, 2015 12:39 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

What memo?

> On Feb 9, 2015, at 12:01 PM, Hans Mast <hansmast@att.net> wrote:

>

> First off is the settlement memo accurate and okay with you or is there anything you want to change or modify

>

> Sent from my iPhone

>

>> On Feb 9, 2015, at 11:18 AM, Paul Dulberg <pdulberg@comcast.net> wrote:

>>

>> Hi Hans,

>> I received your letter on the pre-trial settlement.

>> I am available on April 9th at 1:30pm.

>>

>> Few '?'s;

>> What room #?

>> Do I need to bring anything?

>> What should I expect?

>>

>> Thanks,

>> Paul

>>

>> Paul Dulberg

>> 847-497-4250

>> Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Pre-trial settlement**
Date: December 27, 2016 6:16:11 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: February 19, 2015 at 2:33:44 PM CST
To: HANS MAST <hansmast@att.net>
Subject: **Re: Pre-trial settlement**

Hans,
I got it...
Why does your mail always arrive opened?
Also, many statements in the memo appear inaccurate. Not sure if it really matters.
I'd ask for more \$ in the demand... There is no way what is written is enough
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Feb 16, 2015, at 11:20 AM, HANS MAST <hansmast@att.net> wrote:

Paul, Sheila is sending out a letter today with a copy of the Memo for you. Let me know when you get it.

Hans

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Few ?'s;
What room #?
Do I need to bring anything?
What should I expect?

Thanks,
Paul

Paul Dulberg
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Sent from my iPad

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Subject: **Fwd: Pre-trial settlement**
Date: December 27, 2016 6:14:49 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: February 19, 2015 at 3:24:20 PM CST
To: Hans Mast <hansmast@att.net>
Subject: **Re: Pre-trial settlement**

Dr Kujawa's office is mailing me the billing information.
They said that it will take just over a week for me to receive it.

Paul Dulberg
847-497-4250
Sent from my iPad

On Feb 19, 2015, at 2:39 PM, Hans Mast <hansmast@att.net> wrote:

That's why am sending it to you to go over. If you ask for too much money it's going to blow them out of the water and they're not even gonna be interested in trying to settle give me a call

Sent from my iPhone

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What should I expect?

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Paul Dulberg
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Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Pre-trial settlement**
Date: December 27, 2016 6:15:25 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: February 19, 2015 at 2:38:05 PM CST
To: HANS MAST <hansmast@att.net>
Subject: **Re: Pre-trial settlement**

One more ?

Why isn't David Gagnon being charged for either the chainsaw incident or his coercion and intimidation to try and get money out of this in a criminal court?

On Feb 19, 2015, at 2:33 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

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Sent from my iPad



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Subject: **Fwd: Pre-trial settlement**
Date: December 27, 2016 6:17:49 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: February 9, 2015 at 12:39:58 PM CST
To: Hans Mast <hansmast@att.net>
Subject: **Re: Pre-trial settlement**

What memo?

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Date: December 27, 2016 6:18:38 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: February 9, 2015 at 11:18:23 AM CST
To: Hans Mast <hansmast@att.net>
Subject: **Pre-trial settlement**

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I received your letter on the pre-trial settlement.
I am available on April 9th at 1:30pm.

Few ?'s;
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Date: February 9, 2015 at 11:18:23 AM CST
To: Hans Mast <hansmast@att.net>
Subject: **Pre-trial settlement**

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Few ?'s;
What room #?
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Paul Dulberg
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From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Memo**
Date: December 27, 2016 6:12:44 PM CST
To: Paul Dulberg <pdulberg@comcast.net>

From: Paul Dulberg <pdulberg@comcast.net>
Date: February 22, 2015 at 6:20:52 PM CST
To: Hans Mast <hansmast@att.net>
Subject: **Re: Memo**

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Never had a lawyer who needed me to help write or correct anything before.
The SSDI lawyer pulled everything from the record and it was perfect.

Yes, I would like to reword much of it because I wouldn't want anything used in it twisted later if we do go to trial.

Yes, I understand that your firm won't back me but it doesn't mean I'm not going to take it to trial anyway. I need the wording to match exactly what I need should I go the distance.

I can honestly say the dollar amount you listed I would never agree to. It wouldn't even cover my wages for the years in physical therapy yet the rest of my life.
If I end up with a structured settlement where I have to chase this guy I believe we can always sell the settlement and cash out. Is that possible?

Paul Dulberg
847-497-4250
Sent from my iPad

On Feb 22, 2015, at 5:58 PM, Hans Mast <hansmast@att.net> wrote:

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Sent from my iPhone

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If maybe we should have one of them try writing the memo?

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847-497-4250
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I have several people that help me. What are you wondering about.

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Hans, do you have a paralegal?

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Memo**
Date: December 27, 2016 6:13:28 PM CST
To: Paul Dulberg <pdulberg@comcast.net>

From: Paul Dulberg <pdulberg@comcast.net>
Date: February 22, 2015 at 5:56:22 PM CST
To: Hans Mast <hansmast@att.net>
Subject: **Re: Memo**

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847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Memo**
Date: December 27, 2016 6:10:40 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: February 22, 2015 at 8:14:16 PM CST
To: Hans Mast <hansmast@att.net>
Subject: **Re: Memo**

To be honest, you took this case knowing it was my word vs. his.
Now you back out because the value of the case isn't worth your time?
You got some nerve and your earning the reputation of a shady lawyer

On Feb 22, 2015, at 7:42 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

To believe David's version of events you must believe I was committing suicide.
Who in their right mind puts his arm into a chainsaw?

I figured you would cop out again...

Now I'm left wondering...
How hard is it to sue an atty?

And yes I am and have been looking for someone who will take this case...

The issue of my word vs David Gagnons... Did he cut me or did I cut myself?

Of coarse he cut me.

Next issue please?

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Paul I no longer can represent you in the case. We obviously have differences of opinion as to the value of the case. I've been telling you over a year now the problems with the case and you just don't see them. You keep telling me how injured you are and completely ignore that it doesn't matter if you passed away from the accident because we still have to prove that the defendant was at fault. While you think it is very clear - it is not. My guess is that seven out of 10 times you will lose the case outright. That means zero. That's why I have been trying to convince you to agree to a settlement. You clearly do not want to. There's only \$100,000 in coverage. Allstate will never offer anything near the policy limits therefore there's no chance to settle the case. The only alternative is to take the case to trial and I am not interested in doing that. I will wait for you to find a new attorney. I can't assist you any further in this case. Just let me know.

Sent from my iPhone

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I know I'm being confrontative about all of this but let's face it, my working days are over let alone a career I have been building since I was in high school. My dreams of family are over unless I have enough to provide and pay for the care of children and a roof.
What's left for me?
Facebook, scrap booking, crafts, etc... A life of crap...
With ongoing pain and grip issues in my dominate arm/hand that are degenerative.

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I need someone who is on my side, top of their game and will see to it that I'm comfortable after all this is over.

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I know you don't believe I'm hurt...

I'm not interested in belief, I think the facts speak volumes above belief

I question who's side you're on?

Your comments about believing David's deposition, etc...

Hans, I have no degrees but I was better at my career in printing and graphic design than anyone I ever worked with who did. If I need character references from past clients, employers, coworkers, teachers, etc... I have an army of people who know I'm one of the most genuine, honest, dedicated hard working persons who takes responsibility for my actions. David on the other hand isn't a stand up guy at all. He couldn't even take responsibility for his actions not to mention his attempts at collecting from this, which I believe constitutes insurance fraud.

Oh and I'm contacting the McHenry county states atty... I know too much time has passed since the threats but those threats were for a future time once all this was settled. If he attempts to collect or make good on his threats and if I end up back in the hospital I want everyone to know who to go get. I'm done playing nice with this guy and I can only hope I have an attorney who feels the same.

I have to ask since you think I don't understand, what is it you're trying to do?

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To: paul_dulberg@comcast.net

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Date: February 22, 2015 at 7:14:43 PM CST
To: Hans Mast <hansmast@att.net>
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Paul

On Feb 22, 2015, at 6:24 PM, Hans Mast <hansmast@att.net> wrote:

Okay Paul I won't file the memo. Some would say that giving a client an opportunity to review a settlement memo is a good idea. In the past I have found clients appreciate reviewing these documents. I don't think you understand your case at all. To be honest. Just find an attorney who you like and we'll go that way. I was just trying to help. You obviously do not understand what I'm trying to do and that's fine. Let me know when you find one. Thanks

Sent from my iPhone

On Feb 22, 2015, at 6:20 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

My case is "gross negligence" causing "untreatable, irreversible and debilitating harm"

Never had a lawyer who needed me to help write or correct anything before.

The SSDI lawyer pulled everything from the record and it was perfect.

Yes, I would like to reword much of it because I wouldn't want anything used in it twisted later if we do go to trial.

Yes, I understand that your firm won't back me but it doesn't mean I'm not going to take it to trial anyway. I need the wording to match exactly what I need should I go the distance.

I can honestly say the dollar amount you listed I would never agree to. It wouldn't even cover my wages for the years in physical therapy yet the rest of my life.

If I end up with a structured settlement where I have to chase this guy I believe we can always sell the settlement and cash out. Is that possible?

Paul Dulberg
847-497-4250
Sent from my iPad

On Feb 22, 2015, at 5:58 PM, Hans Mast <hansmast@att.net> wrote:

I'm not sure what you're saying. I tried to tell you over and over again the nature in which the memo is written isn't important. This is just a memo to introduce the judge to the case. If there are different ways you want to say things I'm happy to do that. It's going to serve its purpose perfectly.

Sent from my iPhone

On Feb 22, 2015, at 5:56 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

If maybe we should have one of them try writing the memo?

Paul Dulberg
847-497-4250
Sent from my iPad

On Feb 22, 2015, at 5:42 PM, Hans Mast <hansmast@att.net> wrote:

I have several people that help me. What are you wondering about.

Sent from my iPhone

On Feb 21, 2015, at 1:32 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

Hans, do you have a paralegal?

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Memo**
Date: December 28, 2016 9:37:32 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: December 27, 2016 at 6:13:28 PM CST
To: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Memo**

From: Paul Dulberg <pdulberg@comcast.net>
Date: February 22, 2015 at 5:56:22 PM CST
To: Hans Mast <hansmast@att.net>
Subject: **Re: Memo**

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Paul Dulberg
847-497-4250
Sent from my iPad

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Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Memo**
Date: December 29, 2016 8:06:21 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: February 22, 2015 at 5:56:22 PM CST
To: Hans Mast <hansmast@att.net>
Subject: **Re: Memo**

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Paul Dulberg
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Sent from my iPad

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Hans, do you have a paralegal?

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Memo**
Date: December 28, 2016 9:36:59 AM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: February 22, 2015 at 6:20:52 PM CST
To: Hans Mast <hansmast@att.net>
Subject: **Re: Memo**

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The SSDI lawyer pulled everything from the record and it was perfect.

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Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Memo**
Date: December 27, 2016 6:14:03 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: February 21, 2015 at 1:32:08 PM CST
To: Hans Mast <hansmast@att.net>
Subject: **Memo**

Hans, do you have a paralegal?

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: Fwd: Memo
Date: December 27, 2016 6:00:31 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: February 22, 2015 at 11:33:50 PM CST
To: Hans Mast <hansmast@att.net>
Subject: Re: Memo

How much are you or Your firm willing to pay me for the inconvenience of finding new council after sitting on this case?

On Feb 22, 2015, at 9:38 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

No answer, that's what I thought...

Your not very quick when cornered and your not excused from this case until I say you are whether or not your firm agrees.
Got it?

On Feb 22, 2015, at 9:05 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

Is your wanting out a personal issue with me or is it strictly financial?

On Feb 22, 2015, at 9:01 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

Oh, and unless I'm wrong, David did admit to having control over the chainsaw. David, in his lie, admitted to seeing me move my arm and continued along his path with the chainsaw at cutting rpm's.
In effect he did admit it was his fault.

On Feb 22, 2015, at 8:52 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

You do not have my consent to quit.

On Feb 22, 2015, at 8:23 PM, Hans Mast <hansmast@att.net> wrote:

Paul, honesty hurts. I am honest to a fault sometimes. You told me at the start that David would admit his fault. That proved not to be true. Still your threats and putdowns don't change anything. Just find another attorney and we can part ways.

Sent from my iPhone

On Feb 22, 2015, at 8:14 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

To be honest, you took this case knowing it was my word vs. his.
Now you back out because the value of the case isn't worth your time?
You got some nerve and your earning the reputation of a shady lawyer

On Feb 22, 2015, at 7:42 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

To believe David's version of events you must believe I was committing suicide.
Who in their right mind puts his arm into a chainsaw?

I figured you would cop out again...

Now I'm left wondering...
How hard is it to sue an atty?

And yes I am and have been looking for someone who will take this case...

The issue of my word vs David Gagnons... Did he cut me or did I cut myself?

Of coarse he cut me.

Next issue please?

Paul Dulberg
847-497-4250
Sent from my iPad

| On Feb 22, 2015, at 7:20 PM, Hans Mast <hansmast@att.net> wrote:

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Memo**
Date: December 27, 2016 6:01:21 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: February 22, 2015 at 9:38:57 PM CST
To: Hans Mast <hansmast@att.net>
Subject: **Re: Memo**

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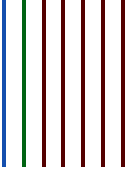
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Of coarse he cut me.

Next issue please?

A series of seven vertical bars of varying heights and colors (blue, green, red, black, red, black, black) are positioned to the left of the contact information.

Paul Dulberg
847-497-4250
Sent from my iPad

| On Feb 22, 2015, at 7:20 PM, Hans Mast <hansmast@att.net> wrote:

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Memo**
Date: December 27, 2016 6:01:51 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: February 22, 2015 at 9:05:46 PM CST
To: Hans Mast <hansmast@att.net>
Subject: **Re: Memo**

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847-497-4250
Sent from my iPad

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From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Memo**
Date: December 27, 2016 6:02:18 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: February 22, 2015 at 9:01:05 PM CST
To: Hans Mast <hansmast@att.net>
Subject: **Re: Memo**

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Paul Dulberg
847-497-4250
Sent from my iPad

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From: Paul Dulberg <pdulberg@comcast.net>
Subject: Fwd: Memo
Date: December 27, 2016 6:02:48 PM CST
To: paul_dulberg@comcast.net

Begin forwarded message:

From: Paul Dulberg <pdulberg@comcast.net>
Date: February 22, 2015 at 8:52:37 PM CST
To: Hans Mast <hansmast@att.net>
Subject: Re: Memo

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Next issue please?

Paul Dulberg
847-497-4250
Sent from my iPad

On Feb 22, 2015, at 7:20 PM, Hans Mast <hansmast@att.net> wrote:

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Release of atty lean**
Date: December 27, 2016 5:11:22 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: February 23, 2015 at 4:37:45 PM CST
To: Hans Mast <hansmast@att.net>
Subject: **Re: Release of atty lean**

I am meeting with an attorney on Thursday.
Can it wait till after?

Paul Dulberg
847-497-4250
Sent from my iPad

On Feb 23, 2015, at 4:33 PM, Hans Mast <hansmast@att.net> wrote:

Do you want me to just wait and not proceed with the Settlement conference.

Sent from my iPhone

On Feb 23, 2015, at 4:01 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

Hans,
Once I find new council, Are you willing to release all leans and fees you and your firm have for this case?

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Release of atty lean**
Date: December 27, 2016 5:57:06 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: February 23, 2015 at 4:36:12 PM CST
To: Hans Mast <hansmast@att.net>
Subject: **Re: Release of atty lean**

Thanks
On another note;
The McGuires home owners policy...
How did they get around the agency clause?

Paul Dulberg
847-497-4250
Sent from my iPad

On Feb 23, 2015, at 4:27 PM, Hans Mast <hansmast@att.net> wrote:

Paul I'm definitely willing to be reasonable and consider several different options. Typically how it's done is I will work with your new attorney on the details. But to have me release everything given the time and expense I've invested in the case without knowing what the final result is unfair. We have completed substantially 100% of the fact discovery. All that needs to be done is deposing experts and going to trial. But don't get me wrong I think we can work out something very reasonable. Typically any type of lien arrangement is done when the case is concluded.

Sent from my iPhone

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Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Release of atty lean**
Date: December 27, 2016 5:57:38 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: February 23, 2015 at 4:01:16 PM CST
To: Hans Mast <hansmast@att.net>
Subject: **Release of atty lean**

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Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Gagnon and McGuire homeowner policies**
Date: December 27, 2016 5:06:36 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: February 26, 2015 at 8:41:49 AM CST
To: Hans Mast <hansmast@att.net>
Subject: **Re: Gagnon and McGuire homeowner policies**

I will and thank you
Enjoy the snow

Paul Dulberg
847-497-4250
Sent from my iPad

On Feb 26, 2015, at 8:25 AM, Hans Mast <hansmast@att.net> wrote:

We don't have the polls your numbers. I am in charge of the file and therefore no one else knows what is in the file. If you need a list of our costs you can call Sheila and ask her to have a printout of it.

Sent from my iPhone

On Feb 26, 2015, at 8:23 AM, Paul Dulberg <pdulberg@comcast.net> wrote:

Hans,
I'm not asking to see you.
I'm asking for a copy of the policy numbers and an accounting of all the fees your firm feels it's entitled to.
Please have someone at the office print them out and have them available for pickup.
Thanks in advance again,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Feb 26, 2015, at 8:03 AM, Hans Mast <hansmast@att.net> wrote:

I'm not in the office today Paul. If the attorney needs information regarding this he can definitely call me tomorrow

Sent from my iPhone

On Feb 26, 2015, at 8:02 AM, Paul Dulberg <pdulberg@comcast.net> wrote:

Then please have a complete accounting of all fees you feel entitled to re guarding these cases ready for pickup by noon.
Thanks,
Paul

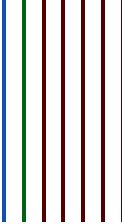
On Feb 26, 2015, at 7:43 AM, Hans Mast <hansmast@att.net> wrote:

I don't think I have any insurance policies in the file

Sent from my iPhone

On Feb 26, 2015, at 7:42 AM, Paul Dulberg <pdulberg@comcast.net> wrote:

Hi Hans,
Please arrange for a copy of both the McGuire and Gagnon homeowner insurance policies be available for me to pick up

A series of seven vertical bars of varying heights and colors (blue, green, red, black, black, black, black) positioned to the left of the text.

by noon today.
I will pay for copy fees when I pick them up.
Thank you,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Gagnon and McGuire homeowner policies**
Date: December 27, 2016 5:07:14 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: February 26, 2015 at 8:23:04 AM CST
To: Hans Mast <hansmast@att.net>
Subject: **Re: Gagnon and McGuire homeowner policies**

Hans,
I'm not asking to see you.
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Paul Dulberg
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Subject: **Fwd: Gagnon and McGuire homeowner policies**
Date: December 27, 2016 5:07:41 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: February 26, 2015 at 8:06:13 AM CST
To: Hans Mast <hansmast@att.net>
Subject: **Re: Gagnon and McGuire homeowner policies**

Please include the homeowner insurance policy numbers for both the McGuires and Gagnons
Thanks in advance,
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Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Gagnon and McGuire homeowner policies**
Date: December 27, 2016 5:08:24 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: February 26, 2015 at 8:02:01 AM CST
To: Hans Mast <hansmast@att.net>
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I will pay for copy fees when I pick them up.
Thank you,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Gagnon and McGuire homeowner policies**
Date: December 27, 2016 5:10:21 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: February 26, 2015 at 7:42:12 AM CST
To: Hans Mast <hansmast@att.net>
Subject: **Gagnon and McGuire homeowner policies**

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From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Council**
Date: December 27, 2016 4:47:46 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: March 5, 2015 at 8:39:34 AM CST
To: Hans Mast <hansmast@att.net>
Subject: **Re: Council**

Hans,
I'm waiting for an answer

Paul Dulberg
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Please tell me I'm wrong

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Date: December 27, 2016 4:48:10 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: March 4, 2015 at 9:10:06 PM CST
To: Hans Mast <hansmast@att.net>
Subject: **Re: Council**

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Date: December 27, 2016 4:48:48 PM CST
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From: Paul Dulberg <pdulberg@comcast.net>
Date: March 4, 2015 at 7:44:04 PM CST
To: Hans Mast <hansmast@att.net>
Subject: **Re: Council**

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Date: December 27, 2016 4:49:19 PM CST
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Date: December 27, 2016 4:49:50 PM CST
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Date: December 27, 2016 4:51:25 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: March 4, 2015 at 6:17:41 PM CST
To: Hans Mast <hansmast@att.net>
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Subject: **Fwd: Council**
Date: December 27, 2016 5:00:07 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: March 4, 2015 at 4:23:11 PM CST
To: HANS MAST <hansmast@att.net>
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847-497-4250
Sent from my iPad

On Mar 4, 2015, at 3:34 PM, Hans Mast <hansmast@att.net> wrote:

I can do it either now or after the pretrial settlement conference.

Sent from my iPhone

On Mar 4, 2015, at 3:24 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

Hans,
Do you plan to file a motion to remove yourself from this case?

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Council**
Date: December 27, 2016 5:04:14 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: March 4, 2015 at 3:24:12 PM CST
To: Hans Mast <hansmast@att.net>
Subject: **Council**

Hans,
Do you plan to file a motion to remove yourself from this case?

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Dr.Kujawa billing**
Date: December 27, 2016 5:04:43 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: March 4, 2015 at 8:21:56 AM CST
To: Hans Mast <hansmast@att.net>
Subject: **Dr.Kujawa billing**

Hans,
I received the billing information from Dr. Kujawa's office.
Will drop it off next time I'm in town.
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Injury case**
Date: December 27, 2016 4:42:48 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: March 12, 2015 at 1:13:59 PM CDT
To: Saul Ferris <saulferris1@gmail.com>
Subject: **Re: Injury case**

Hi Saul,

Have you already mailed the documents or can they be picked up?

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Mar 6, 2015, at 2:40 PM, Saul Ferris <saulferris1@gmail.com> wrote:

Hi Paul

I decided not to accept your case primarily based upon you settling with the homeowners for 5 thousand. I have mailed your file back to you. I would suggest attending the pretrial to at least see what kind of settlement offer is made. Thanks for letting me review your case. Sorry I can't help you. Best, Saul

On Mar 6, 2015 1:13 PM, "Paul Dulberg" <pdulberg@comcast.net> wrote:

Hi Saul,
I'm sending this to see if I got your email address correct.
Paul

Paul Dulberg
[847-497-4250](tel:847-497-4250)
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Injury case**
Date: December 27, 2016 4:46:16 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: March 6, 2015 at 10:18:33 PM CST
To: Saul Ferris <saulferris1@gmail.com>
Subject: **Re: Injury case**

Hi Saul,
Did you speak with my current attorney?
Thank you for your time and advice.
Paul

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847-497-4250
Sent from my iPad

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Paul Dulberg
[847-497-4250](tel:847-497-4250)
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Injury case**
Date: December 27, 2016 4:46:47 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: March 6, 2015 at 1:13:06 PM CST
To: "saulferris1@gmail.com" <saulferris1@gmail.com>
Subject: **Injury case**

Hi Saul,
I'm sending this to see if I got your email address correct.
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Dr. Kujawa**
Date: December 27, 2016 4:45:12 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: March 10, 2015 at 11:14:15 AM CDT
To: Hans Mast <hansmast@att.net>
Subject: **Dr. Kujawa**

Hans,

You should have the billing for Dr. Kujawa ending on my last visit.

Today I had another appointment with her. She set me up to see her again in 6 months on September 15th and it will be every 6 months from this point on. This visit is not included in the Billing you received.

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Certified mail**
Date: December 27, 2016 4:30:06 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: March 13, 2015 at 12:14:41 PM CDT
To: Hans Mast <hansmast@att.net>
Subject: **Re: Certified mail**

Hans,

May I remind you, Less than 2 weeks ago you said in an email you had all the records ready for my new attorney. I can provide a copy of that email if you can't even remember two weeks ago or can't figure out how to go back that far in your email account.

Now that you removed yourself, you claim that you cannot turn over the records until your paid.

The lean is your only guarantee. It's the same guarantee all the medical professionals have against this case.

If you are unwilling then This has all the makings of what society calls a shyster lawyer.

Please Turn over all records pertaining to this case from start to finish for you may not speak with my new council.

I most likely already have to pay double attorney fees for this case thanks to you.

Please don't cost me any more money or I may just let this case expire and you get nothing.

Is that what you want?

Paul Dulberg
847-497-4250
Sent from my iPad

On Mar 13, 2015, at 11:49 AM, Paul Dulberg <pdulberg@comcast.net> wrote:

Sir,

Your fees are guaranteed. You have your lean.

Please don't make me go before the judge and have the records subpoenaed.

Paul Dulberg
847-497-4250
Sent from my iPad

On Mar 13, 2015, at 11:25 AM, Hans Mast <hansmast@att.net> wrote:

Paul, I'm happy to deal with your new attorney on our fee but we can't release the file until we get our costs paid back.

Sent from my iPhone

On Mar 13, 2015, at 11:21 AM, Paul Dulberg <pdulberg@comcast.net> wrote:

Hans/Sir,

I don't want my new attorney to even speak with you.
And yes I have that right.

You have your lean against this case and you removed yourself against my wishes. That lean is as good as it gets. Your guaranteed your share.

Please Have those files ready and notify me when I may pick them up as I am limited on the time to hire a new attorney.

Paul Dulberg
847-497-4250
Sent from my iPad

On Mar 13, 2015, at 11:01 AM, Hans Mast <hansmast@att.net> wrote:

Paul. I am seriously willing to work with you to get new counsel. But you have to understand that until our costs are paid we can't let the file out of our office because we invested all the time and money into the file. Your new attorney will surely know this....

Sent from my iPhone

On Mar 13, 2015, at 10:51 AM, Paul Dulberg <pdulberg@comcast.net> wrote:

Hans,

Your motion was granted.

Please put together all the materials you have concerning this case and notify me when they can be picked up.

Please include everything, emails, notes, depositions, motions, recordings, etc...

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Mar 12, 2015, at 5:38 PM, Hans Mast <hansmast@att.net> wrote:

Paul I wish you the best of luck in the future. I'm sorry it couldn't have worked out better for you.

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Certified mail**
Date: December 27, 2016 4:30:37 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: March 13, 2015 at 11:49:16 AM CDT
To: Hans Mast <hansmast@att.net>
Subject: **Re: Certified mail**

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Subject: **Fwd: Certified mail**
Date: December 27, 2016 4:31:03 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: March 13, 2015 at 11:21:41 AM CDT
To: Hans Mast <hansmast@att.net>
Subject: **Re: Certified mail**

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And yes I have that right.

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From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Certified mail**
Date: December 27, 2016 4:32:00 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: March 13, 2015 at 10:51:25 AM CDT
To: Hans Mast <hansmast@att.net>
Subject: **Re: Certified mail**

Hans,

Your motion was granted.

Please put together all the materials you have concerning this case and notify me when they can be picked up.

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Paul

Paul Dulberg
847-497-4250
Sent from my iPad

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From: Hans Mast <hansmast@att.net>
Subject: **Re: Certified mail**
Date: March 12, 2015 10:36:25 AM CDT
To: Paul Dulberg <pdulberg@comcast.net>

I have done nothing to lose your respect. I have gone far above what you would get from any other attorney you just don't realize it or appreciate it. Instead you continue to focus on issues that have nothing to do with your case. You don't listen to my advice. Which is fine. You don't have to listen to my advice. But 9 out of 10 times you will lose this case for trial. As I told you before that is why the defense is never going to offer the policy limits. To settle the case you will need to take far less than the limits. But you don't have to you definitely can go to trial. That is your personal choice. In my view your case is not worth the limits given the issues we've already discussed. So I have done what I can do for you.

We have I think \$3000 in costs that we will be paid no matter who is handling Case. We have worked on the case for years without pay....but if it will allow you to find another attorney we will consider waiving Our fee unless your eventual recovery exceeds \$100,000.

Sent from my iPhone

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Hans,

I have found several attorneys and none are willing to represent me as long as you hold the lean on this case and apparently it is not legal for me to finance their representation by other means.

Respect for your thoughts does not constitute a breakdown in communications.

Respect is earned through truth, hard work and results.

I am asking for an honest brief to go before the judge. That is all.

Earn my respect and you will receive the best recommendation I have ever given anyone.

Paul

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On Mar 12, 2015, at 10:06 AM, Hans Mast <hansmast@att.net> wrote:

Paul I will be happy to deal with any attorney considering your case directly regarding my lien. But not until they call me to talk. As is clear with your email and many others you do not respect my thoughts and/or knowledge about these cases and there is no point in continuing any further in dealing with an unsatisfied client.

Find an attorney and I will talk to them about the lien.

Sent from my iPhone

On Mar 12, 2015, at 9:12 AM, Paul Dulberg <pdulberg@comcast.net> wrote:

Hi Hans,

Received your certified mail requesting to be released from my case due to a breakdown in communication between you and I.

I ask that you not follow through with this action unless you are willing to also sign off on your lean against my case. As I have no chance in hell of getting another attorney willing to take this case on without your lean being freed from this case. Bottom line... No attorney I have spoken with is willing to trust that you will pay them from your lean.

Please withdraw your motion as there has been no breakdowns in communications between you and I.

The only breakdown was a very poorly written brief you asked me to look over in which the only truthful substance in it was the names and dates. Oh and the fact that you did manage to put the chainsaw in the correct persons hands.



I hope to be able to review your revised copy of this brief again soon.

Best wishes and Thank you,
Paul

I ask that if
Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Certified mail**
Date: March 12, 2015 3:04:08 PM CDT
To: Paul Dulberg <pdulberg@comcast.net>

Paul Dulberg
847-497-4250
Sent from my iPad

Begin forwarded message:

From: Paul Dulberg <pdulberg@comcast.net>
Date: March 12, 2015 at 1:47:28 PM CDT
To: Hans Mast <hansmast@att.net>
Subject: **Re: Certified mail**

I'll see you tomorrow in court room 201 at 9 am.

Paul Dulberg
847-497-4250
Sent from my iPad

On Mar 12, 2015, at 12:14 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

Hans,

Your cornering of me and my brother in your office, bullying me into signing off on The McGuires policy citing cases that have nothing to do with the agency clause in the homeowners policy, which clearly makes her policy accountable. You sir are the one whom told me that I would never see a dime from either case if I didn't sign that piece of paper before leaving your office that day. You wouldn't even let me sleep on it as I had asked. You said you needed the \$5,000 settlement with the McGuire's insurance to help fund your costs for the case with David Gagnon.

Then when the physical therapists tried to demand payment in full you told me and my mother that medical leans against lawsuits often expire before the case is resolved saying yes the medical providers can proceed in collecting funds from my assets. Meaning my home. Forcing me into bankruptcy. Then, after filing for bankruptcy, denying you ever said that to both me and mother and going on to say to us that filing for bankruptcy protection had ruined the case.

All that followed up by getting a brief to review from you on the David Gagnon case that was of such a poor understanding of the facts are what lost any hope of respect I had.

I am and have been trying to get you to be professional and earn that respect back at every step.

If you had not taken advantage of my ignorance you would not be receiving this letter nor trying to squirm your way out of representing me today.

As far as your costs and in light of your poor performance to date, it throws into question all of the work you have done on this case. Even the depositions you sat in on are in question. Do you actually think anyone in their right mind wouldn't see it that way.

You may argue strategy as a defense for incompetence but since you sat in on the medical depositions and don't even know what medications I was and wasn't prescribed after almost 3-1/2 years on this case I highly doubt anyone will see your defense as viable.

Exactly, What part of being harmed by both the McGuires and Gagnon through no fault of my own is 9 out of 10 times a losing case?

Exactly what part of you manipulating me into a settlement for only \$5000 was seeing to my best interests?

Exactly how is lying in a briefing you were prepared to put before a judge is in my best interests?

Exactly how is giving you chance after chance to correct yourself not giving you the respect you think you deserve from me?

I can keep going...

I have witnesses to all of this. It's not just your word vs mine.

Bottom line is if you want out simply because you feel I have no respect for you then all of your fees are subject and any lean you have is subject.

I'm giving you the opportunity to remedy this coarse of action you have chosen.

Do you chose to be professional and do the job your capable of or do you chose to remove yourself for some made up reason. Our emails alone show there is no breakdown in communication. We are still communicating. This email proves that.

So, unless you can explain your action to remove yourself from this case for some excusable reason I see no reason why you feel your entitled to being able to get excused from it at all.

I put you to task to do as you agreed to and represent me to whatever ends this case comes to. Will you be professional and finish what you started?

Damn these emails hurt to type...

Wish you had it in you to go after the bad guy who did this and not your innocent client.

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Date: December 27, 2016 4:39:46 PM CST
To: paul_dulberg@comcast.net

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To: Hans Mast <hansmast@att.net>
Subject: **Re: Certified mail**

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Find an attorney and I will talk to them about the lien.

Sent from my iPhone

On Mar 12, 2015, at 9:12 AM, Paul Dulberg <pdulberg@comcast.net> wrote:

Hi Hans,

Received your certified mail requesting to be released from my case due to a breakdown in communication between you and I.

I ask that you not follow through with this action unless you are willing to also sign off on your lean against my case. As I have no chance in hell of getting another attorney willing to take this case on without your lean being freed from this case. Bottom line... No attorney I have spoken with is willing to trust that you will pay them from your lean.

Please withdraw your motion as there has been no breakdowns in communications between you and I.

The only breakdown was a very poorly written brief you asked me to look over in which the only truthful substance in it was the names and dates. Oh and the fact that you did manage to put the chainsaw in the correct persons hands.

I hope to be able to review your revised copy of this brief again soon.

Best wishes and Thank you,
Paul

I ask that if
Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Certified mail**
Date: December 27, 2016 4:43:25 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: March 12, 2015 at 12:14:03 PM CDT
To: Hans Mast <hansmast@att.net>
Subject: **Re: Certified mail**

Hans,

Your cornering of me and my brother in your office, bullying me into signing off on The McGuires policy citing cases that have nothing to do with the agency clause in the homeowners policy, which clearly makes her policy accountable. You sir are the one whom told me that I would never see a dime from either case if I didn't sign that piece of paper before leaving your office that day. You wouldn't even let me sleep on it as I had asked. You said you needed the \$5,000 settlement with the McGuire's insurance to help fund your costs for the case with David Gagnon.

Then when the physical therapists tried to demand payment in full you told me and my mother that medical leans against lawsuits often expire before the case is resolved saying yes the medical providers can proceed in collecting funds from my assets. Meaning my home. Forcing me into bankruptcy. Then, after filing for bankruptcy, denying you ever said that to both me and mother and going on to say to us that filing for bankruptcy protection had ruined the case.

All that followed up by getting a brief to review from you on the David Gagnon case that was of such a poor understanding of the facts are what lost any hope of respect I had.

I am and have been trying to get you to be professional and earn that respect back at every step.

If you had not taken advantage of my ignorance you would not be receiving this letter nor trying to squirm your way out of representing me today.

As far as your costs and in light of your poor performance to date, it throws into question all of the work you have done on this case. Even the depositions you sat in on are in question. Do you actually think anyone in their right mind wouldn't see it that way.

You may argue strategy as a defense for incompetence but since you sat in on the medical depositions and don't even know what medications I was and wasn't prescribed after almost 3-1/2 years on this case I highly doubt anyone will see your defense as viable.

Exactly, What part of being harmed by both the McGuires and Gagnon through no fault of my own is 9 out of 10 times a losing case?

Exactly what part of you manipulating me into a settlement for only \$5000 was seeing to my best interests?

Exactly how is lying in a briefing you were prepared to put before a judge is in my best interests?

Exactly how is giving you chance after chance to correct yourself not giving you the respect you think you deserve from me?

I can keep going...
I have witnesses to all of this. It's not just your word vs mine.

Bottom line is if you want out simply because you feel I have no respect for you then all of your fees are subject and any lean you have is subject.

I'm giving you the opportunity to remedy this coarse of action you have chosen.

Do you chose to be professional and do the job your capable of or do you chose to remove yourself for some made up reason. Our emails alone show there is no breakdown in communication. We are still communicating. This email proves that.

So, unless you can explain your action to remove yourself from this case for some excusable reason I see no reason why you feel your entitled to being able to get excused from it at all.

I put you to task to do as you agreed to and represent me to whatever ends this case comes to. Will you be professional and finish what you started?

Damn these emails hurt to type...

Wish you had it in you to go after the bad guy who did this and not your innocent client.

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Mar 12, 2015, at 10:36 AM, Hans Mast <hansmast@att.net> wrote:

I have done nothing to lose your respect. I have gone far above what you would get from any other attorney you just don't realize it or appreciate it. Instead you continue to focus on issues that have nothing to do with your case. You don't listen to my advice. Which is fine. You don't have to listen to my advice. But 9 out of 10 times you will lose this case for trial. As I told you before that is why the defense is never going to offer the policy limits. To settle the case you will need to take far less than the limits. But you don't have to you definitely can go to trial. That is your personal choice. In my view your case is not worth the limits given the issues we've already discussed. So I have done what I can do for you.

We have I think \$3000 in costs that we will be paid no matter who is handling Case. We have worked on the case for years without pay....but if it will allow you to find another attorney we will consider waiving Our fee unless your eventual recovery exceeds \$100,000.

Sent from my iPhone

On Mar 12, 2015, at 10:19 AM, Paul Dulberg <pdulberg@comcast.net> wrote:

Hans,

I have found several attorneys and none are willing to represent me as long as you hold the lean on this case and apparently it is not legal for me to finance their representation by other means.

Respect for your thoughts does not constitute a breakdown in communications.

Respect is earned through truth, hard work and results.

I am asking for an honest brief to go before the judge. That is all.

Earn my respect and you will receive the best recommendation I have ever given anyone.

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Mar 12, 2015, at 10:06 AM, Hans Mast <hansmast@att.net> wrote:

Paul I will be happy to deal with any attorney considering your case directly regarding my lien. But not until they call me to talk. As is clear with your email and many others you do not respect my thoughts and/or knowledge about these cases and there is no point in continuing any further in dealing with an unsatisfied client.

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Please withdraw your motion as there has been no breakdowns in communications between you and I.

The only breakdown was a very poorly written brief you asked me to look over in which the only truthful substance in it was the names and dates. Oh and the fact that you did manage to put the chainsaw in the correct persons hands.

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Paul

I ask that if
Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Certified mail**
Date: December 27, 2016 4:44:01 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: March 12, 2015 at 10:19:47 AM CDT
To: Hans Mast <hansmast@att.net>
Subject: **Re: Certified mail**

Hans,

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Paul Dulberg

847-497-4250
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From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Certified mail**
Date: December 27, 2016 4:44:45 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: March 12, 2015 at 9:12:05 AM CDT
To: Hans Mast <hansmast@att.net>
Subject: **Certified mail**

Hi Hans,

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Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Bankruptcy**
Date: December 27, 2016 4:31:30 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: March 13, 2015 at 11:10:45 AM CDT
To: David Stretch <stretchlaw@gmail.com>
Subject: **Bankruptcy**

Hi David,

Please note and notify whomever needs to know pertaining the bankruptcy

As of this morning Hans Mast and the Popovich law firm are no longer representatives in the lawsuit that is pending.

I was granted 21 days to find new council.

I ask that any and all communications cease immediately with the Popovich firm pertaining to this case.

Thank you,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Missing Depositions and pre-trial settlement brief**
Date: December 27, 2016 4:28:12 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: March 24, 2015 at 10:48:56 AM CDT
To: Brad J Balke <brad@balkelaw.com>
Subject: **Re: Missing Depositions and pre-trial settlement brief**

Hi Brad,
Were you able to get everything yesterday?
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Mar 20, 2015, at 5:39 PM, Brad J Balke <brad@balkelaw.com> wrote:

I'm picking up the file from Hans on Monday. I'm sure everything will be there. Have a good weekend, Paul!

From: Paul Dulberg
Sent: Friday, March 20, 2015 3:49 PM
To: brad@balkelaw.com
Subject: Missing Depositions and pre-trial settlement brief

Hi Brad,

As we discussed, I was to receive via certified US Mail depositions and communications between Hans Mast and myself from Saul Ferris an attorney in Gurnee, IL. Saul Ferris number is (847) 263-7770

I called Saul Ferris office last week and was assured they were sent. I was told to give it another week.

I called Saul Ferris office again today to find out they were mailed to and signed for at 3416 W. Elm St. McHenry, IL. by someone named Anne Oupl on March 7th. This is Hans Mast office.

I called Hans office and apparently no one by that name works there and no one knows anything about receiving the certified mail.

I'm at a loss as to how these documents were sent to the wrong place and am a bit furious because it has the memo about the pre-trial settlement you wanted to see.

Please advise.

Thank you in advance for your help with this matter,
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Paul Dulberg
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Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: Fwd: Missing Depositions and pre-trial settlement brief
Date: December 27, 2016 4:27:42 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: March 25, 2015 at 7:07:24 PM CDT
To: Brad J Balke <brad@balkelaw.com>
Subject: Re: Missing Depositions and pre-trial settlement brief

I know it's a lot to go through.
I'm available when you have questions

On Mar 24, 2015, at 11:09 AM, Brad J Balke <brad@balkelaw.com> wrote:

Yes. I have the file. It is large. I'm going to start going through it.

From: Paul Dulberg
Sent: Tuesday, March 24, 2015 10:48 AM
To: Brad J Balke
Subject: Re: Missing Depositions and pre-trial settlement brief

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Date: December 27, 2016 4:27:03 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: March 30, 2015 at 4:55:33 PM CDT
To: "<brad@balkelaw.com>" <brad@balkelaw.com>
Subject: Re: Missing Depositions and pre-trial settlement brief

Please feel free to call anytime.
Thanks,
Paul

On Mar 30, 2015, at 10:01 AM, Brad Balke <brad@balkelaw.com> wrote:

I'm reading the deposition testimony....very interesting. I've also placed a call to Mr. Accardo, but he has to call me back.

Hans did include a check for the \$5k settlement from the McGuire's (minus his firm's one-third fee.) See attached.

I believe I have to hold this in my IOLTA account pending the outcome of your case in light of your bankruptcy filing.

I will call you as soon as I talk to Mr. Accardo.

Thanks

Brad

From: Paul Dulberg [mailto:pdulberg@comcast.net]
Sent: Wednesday, March 25, 2015 7:07 PM
To: Brad J Balke
Subject: Re: Missing Depositions and pre-trial settlement brief

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Sent from my iPad

| <check \$5k from McGuire DULBERG.pdf>

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Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: April 9 th**
Date: December 27, 2016 4:25:23 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: April 16, 2015 at 5:24:12 AM CDT
To: Brad J Balke <brad@balkelaw.com>
Subject: **Re: April 9 th**

Hi Brad,
Do we have a new date?
Paul

On Apr 3, 2015, at 4:59 PM, Brad J Balke <brad@balkelaw.com> wrote:

No. Just a scheduling conference.

From: Paul Dulberg
Sent: Friday, April 3, 2015 3:22 PM
To: Brad J Balke
Subject: Re: April 9 th

Should I be there?

On Apr 3, 2015, at 11:59 AM, Brad J Balke <brad@balkelaw.com> wrote:

Unbeknowst to me, the Judge cancelled the settlement conference. I am going in front of the Judge on 4/10 to get the settlement conference re-scheduled.

From: Paul Dulberg
Sent: Friday, April 3, 2015 11:38 AM
To: <brad@balkelaw.com>
Subject: April 9 th

Hi Brad,
Are we on for the April 9th pretrial in the McHenry County Courthouse?
Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: April 9 th**
Date: December 27, 2016 4:25:54 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: April 3, 2015 at 3:22:58 PM CDT
To: Brad J Balke <brad@balkelaw.com>
Subject: **Re: April 9 th**

Should I be there?

On Apr 3, 2015, at 11:59 AM, Brad J Balke <brad@balkelaw.com> wrote:

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Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: April 9 th**
Date: December 27, 2016 4:26:21 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: April 3, 2015 at 11:38:13 AM CDT
To: "<brad@balkelaw.com>" <brad@balkelaw.com>
Subject: **April 9 th**

Hi Brad,
Are we on for the April 9th pretrial in the McHenry County Courthouse?
Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: check from McGuire portion of settlement minus atty fee- \$3,333.33**
Date: December 27, 2016 4:24:57 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: April 29, 2015 at 10:12:44 AM CDT
To: "<brad@balkelaw.com>" <brad@balkelaw.com>
Subject: **Re: check from McGuire portion of settlement minus atty fee- \$3,333.33**

Morning Brad,

You have power of attorney to endorse the draft on my behalf.

Paul

Ps. Wish I could make Hans choke on this check for his lies/incompetence that lead to such a small amount!

Paul Dulberg
847-497-4250
Sent from my iPad

On Apr 29, 2015, at 9:52 AM, Brad Balke <brad@balkelaw.com> wrote:

Paul,

As discussed, Mast gave me a check for \$3,333.33 along with the file. See PDF attached. I need to deposit this in my IOLTA before the check expires.

To that end, Send me a one-line e-mail stating that I have Power of Attorney to endorse the draft on your behalf.

The funds will just sit there until we resolve the rest of the case.

I'm going to call Perry Accardo again on the settlement conference. He has to call me back.

Brad
<check \$5k from McGuire DULBERG.pdf>

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Missing memo for pretrial settlement**
Date: December 27, 2016 4:22:13 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: May 9, 2015 at 4:32:54 PM CDT
To: "<brad@balkelaw.com>" <brad@balkelaw.com>
Subject: **Re: Missing memo for pretrial settlement**

Hi Brad,
Hope you received 2 packages today
Paul

On May 8, 2015, at 2:08 PM, Brad Balke <brad@balkelaw.com> wrote:

I will be at Donahue and Walsh (4310 Crystal Lake Drive office) from 9am to 11am tomorrow-can you drop it off?

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

From: Paul Dulberg [<mailto:pdulberg@comcast.net>]
Sent: Friday, May 08, 2015 12:34 PM
To: <brad@balkelaw.com>
Subject: Missing memo for pretrial settlement

Hi Brad,

Yesterday Saul Ferris office called and said they just received back the packet they mistakenly sent to Hans Mast at Popovich law firm.
In it is the pretrial settlement memo you wanted to see.
There is also the printed depositions of both the homeowners, the defendant and myself.
I picked these up this morning.
Let me know how to get these to you.

Thank you,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Missing memo for pretrial settlement**
Date: December 27, 2016 4:21:34 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: May 12, 2015 at 12:59:20 PM CDT
To: "<brad@balkelaw.com>" <brad@balkelaw.com>
Subject: **Re: Missing memo for pretrial settlement**

Hi Brad,

Thanks for the heads up.

My understanding was the 15k bankruptcy protection limit included all my assets, not just the proceeds from this settlement. I was also informed that I can receive much more than just 15k if the settlement or trial verdict produced enough to satisfy the creditors.

Just so you know...

I won't settle just for the insurance. It isn't enough.

I don't know what a crippled dominate hand/arm is worth but it would seem to me that it is worth a whole lot more than the insurance limits the defendant has.

Thanks and feel free to call me,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On May 12, 2015, at 7:31 AM, Brad Balke <brad@balkelaw.com> wrote:

Paul,

Good news: got a call from Allstate adjuster, Karen O'Neil. She asked me for some of the documents and photographs. This means she is actually evaluating for the pre-trial tomorrow. I'm going to call her later today and try to get the ball rolling.

Also, I reviewed some of the items in the packages you gave me today. Thanks much for those.

Since you filed for bankruptcy protection, you can only collect \$15k from this case, maximum. (This is the exemption amount under bankruptcy law.) I'm not saying we can get you to that number, but be aware that is the most you can possibly collect.

I will call you later today after I have discussed this matter with Allstate.

Brad

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

From: Paul Dulberg [mailto:pdulberg@comcast.net]
Sent: Saturday, May 09, 2015 4:33 PM
To: <brad@balkelaw.com>
Subject: Re: Missing memo for pretrial settlement

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Paul

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847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Missing memo for pretrial settlement**
Date: December 27, 2016 4:23:35 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: May 8, 2015 at 2:21:51 PM CDT
To: "<brad@balkelaw.com>" <brad@balkelaw.com>
Subject: **Re: Missing memo for pretrial settlement**

Yes
I will see you in the morning

Paul Dulberg
847-497-4250
Sent from my iPad

On May 8, 2015, at 2:08 PM, Brad Balke <brad@balkelaw.com> wrote:

I will be at Donahue and Walsh (4310 Crystal Lake Drive office) from 9am to 11am tomorrow-can you drop it off?

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

From: Paul Dulberg [mailto:pdulberg@comcast.net]
Sent: Friday, May 08, 2015 12:34 PM
To: <brad@balkelaw.com>
Subject: Missing memo for pretrial settlement

Hi Brad,

Yesterday Saul Ferris office called and said they just received back the packet they mistakenly sent to Hans Mast at Popovich law firm.
In it is the pretrial settlement memo you wanted to see.
There is also the printed depositions of both the homeowners, the defendant and myself.
I picked these up this morning.
Let me know how to get these to you.

Thank you,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Missing memo for pretrial settlement**
Date: December 27, 2016 4:24:24 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: May 8, 2015 at 12:34:25 PM CDT
To: "<brad@balkelaw.com>" <brad@balkelaw.com>
Subject: **Missing memo for pretrial settlement**

Hi Brad,

Yesterday Saul Ferris office called and said they just received back the packet they mistakenly sent to Hans Mast at Popovich law firm.

In it is the pretrial settlement memo you wanted to see.

There is also the printed depositions of both the homeowners, the defendant and myself.

I picked these up this morning.

Let me know how to get these to you.

Thank you,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Bankruptcy**
Date: December 27, 2016 4:20:16 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: May 14, 2015 at 1:18:01 PM CDT
To: "<brad@balkelaw.com>" <brad@balkelaw.com>
Subject: **Re: Bankruptcy**

Hi Brad,
My mom came up with a good question.
Doesn't David Gagnons homeowners insurance have different parts to the policy that apply?
Parts for just the medical, parts for just damages, parts for pain and suffering, etc...
I suppose it depends on his actual policy and how it's written but I wanted to understand your take on David's policy

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On May 14, 2015, at 12:36 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

Hi Brad,
Please find the attached photo of the bankruptcy discharge dated March 3, 2015.
I will be able to get to Donahue's office tomorrow and have this sent to you if this photo of it isn't sufficient.
Thanks again for everything,
Paul

<IMG_2105.JPG>

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: David Stretch**
Date: December 27, 2016 4:20:56 PM CST
To: paul_dulberg@comcast.net
▶ 1 Attachment, 0.4 KB

From: Paul Dulberg <pdulberg@comcast.net>
Date: May 14, 2015 at 7:16:30 AM CDT
To: "<brad@balkelaw.com>" <brad@balkelaw.com>
Subject: **David Stretch**

Hi Brad,
Thank you for yesterday.
Please find Below is Atty. David Stretch's contact information.
He is the Attorney I have to represent myself in the Bankruptcy.
If you are not able to read the attachment I can send it in text form.
Also, Today I am going to dig out the paperwork I received from the Bankruptcy trustee relieving me from all debtors other than the medical bills and get it over to Donahue's office as soon as I can.
Thank you again for everything,
Paul



[David Stretch.vcf \(0.4 KB\)](#)

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Bankruptcy notice**
Date: December 27, 2016 4:18:46 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: May 18, 2015 at 8:41:02 AM CDT
To: Brad J Balke <brad@balkelaw.com>
Subject: **Re: Bankruptcy notice**

Have you talked with the trustee?

My understanding was its over and that if I felt strongly about paying those I owed I still could but wasn't required to anymore.

If it turns out the suit is still in play for the bankruptcy I wonder why the order from the court I sent you doesn't list the suit as an exemption from the order. On the back of the order it details what the exemptions listed on the front mean and my order didn't have any exemptions listed.

Either way it doesn't matter.

My thoughts are, if we get enough to pay the debts all the better.
Perhaps we can get enough to undo the bankruptcy altogether.
Would be nice not having a bankruptcy on the record.

Thanks again,
Paul

On May 18, 2015, at 8:28 AM, Brad J Balke <brad@balkelaw.com> wrote:

To use a different example, let's say you had a non-liquid asset like a rare piece of art. When you file your BK, the trustee doesn't just let you walk away with it, but rather retains an interest in it, until you can take it to an auction. (The case is the same, you still have to pay back the trustee to the extent you can once proceeds from the "sale" are realized.)

From: Paul Dulberg
Sent: Friday, May 15, 2015 6:48 PM
To: Brad J Balke
Subject: Re: Bankruptcy notice

I don't understand because I do still have real estate after the bankruptcy and I was told I'm now free to refinance it, sell it or keep it so I'm not sure I get the point but ok I guess

On May 15, 2015, at 3:58 PM, Brad J Balke <brad@balkelaw.com> wrote:

The photo is sufficient. Awaiting a call from the trustee. No, the 15k limit is still in force since the case is a recognized asset of yours. Think of it like having real estate, but not selling until after the BK. The asset would still be yours, albeit in a different form.

From: Paul Dulberg
Sent: Friday, May 15, 2015 2:17 PM
To: Brad Balke
Subject: Bankruptcy notice

Hi Brad,
I sent you a photo of the discharge order from the bankruptcy yesterday.
Is the photo sufficient or do I still need to go to Donahue's office and get you a copy?

Also, reading the discharge order it seems to me that the bankruptcy is over and I've been discharged from all debt.
If that is so, doesn't that mean there is no 15k limit anymore?

Below I have attached another photo of the discharge order.

Thanks again,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad
<image1.JPG>

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Bankruptcy notice**
Date: December 27, 2016 4:19:28 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: May 15, 2015 at 6:48:07 PM CDT
To: Brad J Balke <brad@balkelaw.com>
Subject: **Re: Bankruptcy notice**

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To: Brad Balke
Subject: Bankruptcy notice

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Is the photo sufficient or do I still need to go to Donahue's office and get you a copy?

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If that is so, doesn't that mean there is no 15k limit anymore?

Below I have attached another photo of the discharge order.

Thanks again,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad
<image1.JPG>

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Settlement vs. trial**
Date: December 27, 2016 4:17:15 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: May 27, 2015 at 7:19:56 PM CDT
To: Brad J Balke <brad@balkelaw.com>
Subject: **Re: Settlement vs. trial**

Hi Brad,
Just got this message and its late.
Not sure what kind of thoughts are the right kind of thoughts in this type of situation.
Will call tomorrow
Paul

On May 27, 2015, at 1:40 PM, Brad J Balke <brad@balkelaw.com> wrote:

Paul, these kind of thoughts are going to get you a \$0 for sure. Call me at my downtown office 3129868063.

From: Paul Dulberg
Sent: Wednesday, May 27, 2015 11:23 AM
To: Brad Balke
Subject: Settlement vs. trial

Morning Brad,

Talked with my mom and it seems to us that if all I'm going to get is 15k even if we max out the defendants policy limit then I should seriously look at taking this to trial and leaving it up to a jury to decide an appropriate amount. 15k might as well be 0 because it doesn't even begin to pay for the damages I've suffered.

I know the risks and that it would cost me almost 20k more in expenses and that the defendant can run off and pay nothing beyond his insurance limits.

Assuming that Allstate may claim the act was criminal and that their not responsible has to be overcome. I'm not a mind reader and can't make any claim as to their clients intentions and their client isn't going to self incriminate himself so I don't see how their claim of something criminal can hold water. Especially since their client hasn't been charged with any crimes associated with his actions on that day.

At the last court date, The judge asked if I was doing this for principles. I answered no. However, after thinking it through... Seeing as how I'm getting virtually nothing out of this and will eventually lose my home, that I was working most of my life to keep, because SSDI can't cover living here or almost anywhere that I can consider worthy, my principles are evolving and I'm not opposed to going the distance and taking this to trial. I'm willing to make a principled point that people should not get off 'scot free' other than having to find a new insurance company after using a chainsaw on another person causing real life threatening harm with permanent damages.

I'm more than positive that a jury will award more than the insurance limits and that we will not recover anything more than those limits, but one thing is almost for sure, the defendant will most likely have to file bankruptcy to protect his assets and the next person he hurts over the next 7-10 years will have full access to his assets because he won't be able to file bankruptcy again for that period.

Either way, I get virtually nothing so principles are all I have.

On the positive side, If the jury does award an amount more than the insurance limits we get to see if the defendant has any assets that can't be protected and if he does I stand to get the costs of a trial covered a perhaps a smidgen more than 15k, if not, well then I'm in the same boat I am already and nothing changes.

Paul

Paul Dulberg

847-497-4250

Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Settlement vs. trial**
Date: December 27, 2016 4:17:49 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: May 27, 2015 at 11:23:10 AM CDT
To: Brad Balke <brad@balkelaw.com>
Subject: **Settlement vs. trial**

Morning Brad,

Talked with my mom and it seems to us that if all I'm going to get is 15k even if we max out the defendants policy limit then I should seriously look at taking this to trial and leaving it up to a jury to decide an appropriate amount. 15k might as well be 0 because it doesn't even begin to pay for the damages I've suffered.

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Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Release**
Date: December 27, 2016 4:01:42 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: June 9, 2015 at 4:52:13 PM CDT
To: Brad J Balke <brad@balkelaw.com>
Subject: **Re: Release**

Brad,

You could have just stopped with this is the best deal you could get but you didn't.

You pulled a Hans and assaulted me when you threatened to remove yourself from this case if I didn't sign this release before you see the judge.

That's an ultimatum and it's not something I'm going to react to positively.

The way I see it, there is more than just the 2 options in your ultimatum...

A.) I can take this deal, shut up, go away and keep suffering and praying for SSDI

B.) I can refuse to take this deal, lose you as an attorney and have to find new council or simply represent myself and start over with the same 15k on the table and possibly an extra 15k in bankruptcy surplus while still suffering and preying for SSDI.

C.) I can stop this suit all together and lose 15k, in which no one gets anything while I suffer and prey for SSDI

Any which way I go, I'm the one who's getting thrown under the buss and I'm tired of being a victim of others threats.

As of now I'm leaning towards option "C".

As you said, the medical providers have already written off my accounts as loses and that leaves Option "C", me losing 15k, well, it is kind of a cheap way of saying how I feel about the state of my legal representation and their efforts because their afraid they can't prove the defendant put a chainsaw into my arm and that the defendants mother is an elderly woman with whom the jury may sympathize yet didn't see the actual incident, refused to call 911 for help, but did call her insurance followed by a call to the hospital and lied to the staff claiming to be my mother only to disrupt the emergency room treatment not to ask how I was doing but to tell me she was insured. Good for granny, she is insured. Where was her slick phone skills when I needed an ambulance and for god sakes why lie to the hospital staff and call me in the emergency room to tell me the most important thing on her mind... The fact that she was insured. Big deal what did it do to help me?

These people had no concern for anyone's well being other than their own.
They are the type that deserve to get sued. Granny or not.

This may all make a great documentary one day about the state of legal representation and their ethical commitment to following through once they commit themselves to a client. A series false dichotomies of sorts.

It is just a leaning towards option "C" not an actual commitment yet.

I need to sleep on the options for a couple nights

I'll get back to you with my answer just before court starts later this week.

Please remind me, what is the time and date the judge set?

Thanks for everything,
Paul

On Jun 9, 2015, at 2:46 PM, Brad J Balke <brad@balkelaw.com> wrote:

I noticed the address, too. Doesn't really make any difference from our perspective. These agreements are boilerplate, so it is a one-way street for the most part.

From: Paul Dulberg
Sent: Tuesday, June 9, 2015 1:48 PM
To: Brad J Balke
Subject: Re: Release

Just started to read this and I think all those years of proofreading my work in the printing industry gets me in trouble.

The address of the location of the incident in the first paragraph is incorrect. If the address was in Wisconsin wouldn't we be in a different court?

On Jun 9, 2015, at 1:40 PM, Brad J Balke <brad@balkelaw.com> wrote:

Allstate. It isn't written particularly for your case. They use the same release for everyone.

From: Paul Dulberg
Sent: Tuesday, June 9, 2015 1:39 PM
To: <brad@balkelaw.com>
Subject: Re: Release

Who wrote this, you or Allstate?

On Jun 9, 2015, at 12:24 PM, Brad Balke <brad@balkelaw.com> wrote:

Paul,

Please sign on the line near the red "X". If you need a notary, you can go to Donahue's office and sign there.

Brad
<release DULBERG.pdf>

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Release**
Date: December 27, 2016 4:02:32 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: June 9, 2015 at 2:03:03 PM CDT
To: Brad J Balke <brad@balkelaw.com>
Subject: **Re: Release**

Can we reword this agreement and submit it for their approval or is this a one way street?

On Jun 9, 2015, at 1:48 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

Just started to read this and I think all those years of proofreading my work in the printing industry gets me in trouble.

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<release DULBERG.pdf>

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Release**
Date: December 27, 2016 4:14:58 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: June 9, 2015 at 1:48:29 PM CDT
To: Brad J Balke <brad@balkelaw.com>
Subject: **Re: Release**

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<release DULBERG.pdf>

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Release**
Date: December 27, 2016 4:15:44 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: June 9, 2015 at 1:39:02 PM CDT
To: "<brad@balkelaw.com>" <brad@balkelaw.com>
Subject: **Re: Release**

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From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Release**
Date: December 27, 2016 4:16:16 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: June 9, 2015 at 1:22:28 PM CDT
To: "<brad@balkelaw.com>" <brad@balkelaw.com>
Subject: **Re: Release**

Hi Brad,

I got it and would like to meet you before court to discuss before signing this.

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Jun 9, 2015, at 12:24 PM, Brad Balke <brad@balkelaw.com> wrote:

Paul,

Please sign on the line near the red "X". If you need a notary, you can go to Donahue's office and sign there.

Brad
<release DULBERG.pdf>

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Release v trial**
Date: December 27, 2016 2:41:14 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: June 11, 2015 at 5:01:42 PM CDT
To: "<brad@balkelaw.com>" <brad@balkelaw.com>
Subject: **Re: Release v trial**

Brad, I'll be at the courthouse a little early

On Jun 11, 2015, at 1:19 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

at this point, the very least of a judgement on the defendants record is priceless
And that increases my bottom line in more than just a monetary way

On Jun 11, 2015, at 12:24 PM, Brad Balke <brad@balkelaw.com> wrote:

It isn't that it's not winnable....A trial would be very unlikely to improve
your bottom line. After all, you'd have to win more than the offer, plus
expenses, plus the claims on bankruptcy case.

In other words, even if you "win" your trial, you might end up with less in
your pocket.

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

From: Paul Dulberg [<mailto:pdulberg@comcast.net>]
Sent: Thursday, June 11, 2015 10:08 AM
To: Brad Balke
Subject: Release v trial

Brad,

Before I decide to sign this release I'd like to know exactly why it is you
don't think this case is easily winnable?
And please don't spout that it's his word vs mine. That is obvious and is
the situation in most cases.
And don't give me the old your only getting 15k no matter what excuse
because that's not about this case being winnable or not.

I want some honesty
I deserve that much

Please feel free to call me with the answer

Paul
847-497-4250

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To: paul_dulberg@comcast.net

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Subject: **Re: Release v trial**

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your pocket.

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

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And don't give me the old your only getting 15k no matter what excuse
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I want some honesty
I deserve that much

Please feel free to call me with the answer

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847-497-4250

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Subject: **Fwd: Release v trial**
Date: December 27, 2016 2:42:37 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: June 11, 2015 at 10:08:21 AM CDT
To: Brad Balke <brad@balkelaw.com>
Subject: **Release v trial**

Brad,

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And don't give me the old your only getting 15k no matter what excuse because that's not about this case being winnable or not.

I want some honesty
I deserve that much

Please feel free to call me with the answer

Paul
847-497-4250

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Release**
Date: December 27, 2016 2:37:56 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: July 6, 2015 at 9:34:47 AM CDT
To: Brad J Balke <brad@balkelaw.com>
Subject: **Re: Release**

Hi Brad,
What's it going to cost to get the file?
Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Jun 25, 2015, at 8:56 AM, Brad J Balke <brad@balkelaw.com> wrote:

Paul, I have yet to hear from anyone. Allstate is hoping this gets dismissed and they don't have to pay anything to anyone. That is their plan.

From: Paul Dulberg
Sent: Wednesday, June 17, 2015 2:45 PM
To: Brad J Balke
Subject: Re: Release

You probably won't until next week

On Jun 17, 2015, at 1:35 PM, Brad J Balke <brad@balkelaw.com> wrote:

FYI, I haven't heard from Baudin or anyone else.

From: Paul Dulberg
Sent: Friday, June 12, 2015 1:02 PM
To: Brad Balke
Subject: Release

Hi Brad,
Please expect a call from Randall Baudin's office.
Please share whatever it is they need concerning this case.
I'm not sure yet what to do with the sum from Hans. I hope to know more about what has to be done with it early next week.
Thanks again,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Release**
Date: December 27, 2016 2:33:54 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: July 7, 2015 at 12:43:02 PM CDT
To: Brad J Balke <brad@balkelaw.com>
Subject: **Re: Release**

Brad,
I need to reach an agreement on a release of lean before Friday or there will be nothing.
Paul
On Jul 7, 2015, at 11:32 AM, Paul Dulberg <pdulberg@comcast.net> wrote:

How much do you and Hans want to release the lean?
I'm offering you both cash

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Hi Brad,
When and where can I get the entire file?
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Paul Dulberg
847-497-4250
Sent from my iPad

On Jul 6, 2015, at 11:30 AM, Brad J Balke <brad@balkelaw.com> wrote:

\$0.

From: Paul Dulberg
Sent: Monday, July 6, 2015 9:34 AM
To: Brad J Balke
Subject: **Re: Release**

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On Jun 25, 2015, at 8:56 AM, Brad J Balke <brad@balkelaw.com> wrote:

Paul, I have yet to hear from anyone. Allstate is hoping this gets dismissed and they don't have to pay anything to anyone. That is their plan.

From: Paul Dulberg
Sent: Wednesday, June 17, 2015 2:45 PM
To: Brad J Balke
Subject: Re: Release

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On Jun 17, 2015, at 1:35 PM, Brad J Balke <brad@balkelaw.com> wrote:

FYI, I haven't heard from Baudin or anyone else.

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Sent: Friday, June 12, 2015 1:02 PM
To: Brad Balke
Subject: Release

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Sent from my iPad

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Subject: **Fwd: Release**
Date: December 27, 2016 2:36:54 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: July 7, 2015 at 11:17:08 AM CDT
To: Brad J Balke <brad@balkelaw.com>
Subject: **Re: Release**

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Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Release**
Date: December 27, 2016 2:37:24 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: July 7, 2015 at 11:02:19 AM CDT
To: Brad J Balke <brad@balkelaw.com>
Subject: **Re: Release**

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847-497-4250
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Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Release**
Date: December 27, 2016 2:39:30 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: June 17, 2015 at 2:45:44 PM CDT
To: Brad J Balke <brad@balkelaw.com>
Subject: **Re: Release**

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Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Release**
Date: December 27, 2016 2:38:44 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: June 25, 2015 at 2:34:31 PM CDT
To: Brad J Balke <brad@balkelaw.com>
Subject: **Re: Release**

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Paul

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847-497-4250

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Thanks again,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Release**
Date: December 27, 2016 2:40:22 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: June 12, 2015 at 1:02:20 PM CDT
To: Brad Balke <brad@balkelaw.com>
Subject: **Release**

Hi Brad,
Please expect a call from Randall Baudin's office.
Please share whatever it is they need concerning this case.
I'm not sure yet what to do with the sum from Hans. I hope to know more about what has to be done with it early next week.
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Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Lean buyout**
Date: December 27, 2016 2:31:26 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: July 8, 2015 at 12:09:52 PM CDT
To: Hans Mast <hansmast@att.net>
Subject: **Re: Lean buyout**

I can't guess...

I want to make sure your paid for your out of pocket expenses plus something for putting up with me. I'm sure I wasn't the easiest to deal with.

Just give me a number

On Jul 8, 2015, at 11:25 AM, Hans Mast <hansmast@att.net> wrote:

If your calculating our time it'd be a lot. But just give me what you can do.

Sent from my iPhone

On Jul 8, 2015, at 7:44 AM, Paul Dulberg <pdulberg@comcast.net> wrote:

Morning Hans,
As I'm not sure how much you invested, I'm not sure what's reasonable.
What would you consider reasonable?
Paul

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Just make me a reasonable offer. We're happy to work with u

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I need to know how much it's going to cost to get the lean released

On Jul 7, 2015, at 3:57 PM, Hans Mast <hansmast@att.net> wrote:

Whatever you need Paul. What is your thinking.

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Hi Hans,

I need to know if your willing to take a cash payout to release your lean on my case?
If so, how much do you want?

Hope life has been good,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Lean buyout**
Date: December 27, 2016 2:32:00 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: July 8, 2015 at 9:44:22 AM CDT
To: Hans Mast <hansmast@att.net>
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Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Lean buyout**
Date: December 27, 2016 2:27:59 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: July 9, 2015 at 4:43:22 PM CDT
To: Hans Mast <hansmast@att.net>
Subject: **Re: Lean buyout**

Hans,
No need to get back together next Thursday.
Didn't know that brad balky holds the entire lean and paid your expenses.
Sorry for the bother.
Hope the rest of the vacation is wonderful,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Jul 9, 2015, at 1:51 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

How much did he pay you for the expenses?

On Jul 9, 2015, at 1:34 PM, Hans Mast <hansmast@att.net> wrote:

Yes. We agreed with brad to waive our lien...What is \$1,500 I think he paid our expenses.

Sent from my iPhone

On Jul 9, 2015, at 11:27 AM, Paul Dulberg <pdulberg@comcast.net> wrote:

I was informed all your entitled to is \$1539.32 from Brad because you signed off completely on the lean and he already paid you for the rest.
Is this true?

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Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Lean buyout**
Date: December 27, 2016 2:29:36 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: July 9, 2015 at 1:51:31 PM CDT
To: Hans Mast <hansmast@att.net>
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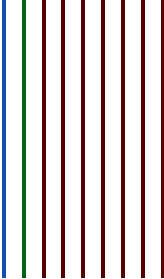
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Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Lean buyout**
Date: December 27, 2016 2:33:05 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: July 7, 2015 at 4:30:38 PM CDT
To: Hans Mast <hansmast@att.net>
Subject: **Re: Lean buyout**

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Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Lean buyout**
Date: December 27, 2016 2:32:41 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: July 7, 2015 at 4:30:38 PM CDT
To: Hans Mast <hansmast@att.net>
Subject: **Re: Lean buyout**

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Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
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Date: December 27, 2016 2:34:32 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: July 7, 2015 at 12:03:41 PM CDT
To: Hans Mast <hansmast@att.net>
Subject: **Re: Lean buyout**

Hans,
If your referring to Brad Balky, he no longer represents me in this case And I am unaware of the deal you two agreed upon.

Here's the deal;
I'm offering cash in return for all leans on this case before Friday or no one gets anything.
Let me know what you want, cash amount or nothing?

Hope your vacation is wonderful,
Paul

On Jul 7, 2015, at 11:42 AM, Hans Mast <hansmast@att.net> wrote:

Hi Paul I think I worked something out with your atty already. Won't b in the office for 2 weeks.

Sent from my iPhone

On Jul 7, 2015, at 11:39 AM, Paul Dulberg <pdulberg@comcast.net> wrote:

Hi Hans,

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Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Lean buyout**
Date: December 27, 2016 2:35:45 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: July 7, 2015 at 11:39:46 AM CDT
To: Hans Mast <hansmast@att.net>
Subject: **Lean buyout**

Hi Hans,

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847-497-4250
Sent from my iPad

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Subject: **Fwd: Lean buyout**
Date: December 27, 2016 2:30:57 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: July 8, 2015 at 3:27:01 PM CDT
To: Brad Balke <brad@balkelaw.com>
Subject: **Lean buyout**

Hi Brad,
If you didn't read the previous emails, I need to know how much you want to sign off the lean on my case before Friday.
I'm available all day Thursday to discuss.
Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Release of lean and fees**
Date: December 27, 2016 2:28:54 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: July 9, 2015 at 3:44:12 PM CDT
To: Brad Balke <brad@balkelaw.com>
Subject: **Release of lean and fees**

Hi Brad,
Called your office numerous times today and was told you would return my call.
You failed to call me back each time.

I want a copy of my file including the digital file along with a release of all interest in any fees in the case before 9am court at the McHenry County Courthouse.

If not I'm informing Judge Meyer of your attempts to block this case from moving forward by Holding both the file and the Lean and calling the Illinois State Bar.

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Case files**
Date: December 27, 2016 2:26:20 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: July 14, 2015 at 1:56:01 PM CDT
To: Brad Balke <brad@balkelaw.com>
Subject: **Re: Case files**

Hi Brad,
Just another reminder that I need the case file.
Paul

On Jul 13, 2015, at 10:45 AM, Paul Dulberg <pdulberg@comcast.net> wrote:

Hi Brad,
When and where can I get both the electronic file and regular file?
Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Case files**
Date: December 27, 2016 2:24:52 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: July 16, 2015 at 1:02:20 PM CDT
To: Brad J Balke <brad@balkelaw.com>
Subject: **Re: Case files**

Picked up the paper file...
What about the electronic file?

Paul Dulberg
847-497-4250
Sent from my iPad

On Jul 15, 2015, at 7:38 AM, Brad J Balke <brad@balkelaw.com> wrote:

The case file will be available at Donahue's office after 1pm today.

From: Paul Dulberg
Sent: Tuesday, July 14, 2015 1:56 PM
To: Brad Balke
Subject: Re: Case files

Hi Brad,
Just another reminder that I need the case file.
Paul

> On Jul 13, 2015, at 10:45 AM, Paul Dulberg <pdulberg@comcast.net> wrote:
>
> Hi Brad,
> When and where can I get both the electronic file and regular file?
> Thanks,
> Paul
>
> Paul Dulberg
> 847-497-4250
> Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Case files**
Date: December 27, 2016 2:13:36 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: July 18, 2015 at 9:51:06 AM CDT
To: Brad J Balke <brad@balkelaw.com>
Subject: **Re: Case files**

Morning Brad,
Any chance I could get the electronic file anytime soon?
In the Paper file I received It appears that it is incomplete, sections of the depositions are missing as well as all the Dr's depositions.
Makes me wonder what else isn't included.
Any chance you have the complete file?
Thanks,
Paul

On Jul 16, 2015, at 1:02 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

Picked up the paper file...
What about the electronic file?

Paul Dulberg
847-497-4250
Sent from my iPad

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The case file will be available at Donahue's office after 1pm today.

From: Paul Dulberg
Sent: Tuesday, July 14, 2015 1:56 PM
To: Brad Balke
Subject: Re: Case files

Hi Brad,
Just another reminder that I need the case file.
Paul

> On Jul 13, 2015, at 10:45 AM, Paul Dulberg <pdulberg@comcast.net> wrote:

>
> Hi Brad,
> When and where can I get both the electronic file and regular file?
> Thanks,
> Paul
>
> Paul Dulberg
> 847-497-4250
> Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Case files**
Date: December 27, 2016 2:27:11 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: July 13, 2015 at 10:45:31 AM CDT
To: Brad Balke <brad@balkelaw.com>
Subject: **Case files**

Hi Brad,
When and where can I get both the electronic file and regular file?
Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Case files**
Date: December 27, 2016 2:25:40 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: July 15, 2015 at 7:43:43 AM CDT
To: Brad J Balke <brad@balkelaw.com>
Subject: **Re: Case files**

Thanks

Paul Dulberg
847-497-4250
Sent from my iPad

On Jul 15, 2015, at 7:38 AM, Brad J Balke <brad@balkelaw.com> wrote:

The case file will be available at Donahue's office after 1pm today.

From: Paul Dulberg
Sent: Tuesday, July 14, 2015 1:56 PM
To: Brad Balke
Subject: Re: Case files

Hi Brad,
Just another reminder that I need the case file.
Paul

> On Jul 13, 2015, at 10:45 AM, Paul Dulberg <pdulberg@comcast.net> wrote:
>
> Hi Brad,
> When and where can I get both the electronic file and regular file?
> Thanks,
> Paul
>
> Paul Dulberg
> 847-497-4250
> Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Case files**
Date: December 27, 2016 2:12:58 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: July 20, 2015 at 7:53:09 AM CDT
To: "<brad@balkelaw.com>" <brad@balkelaw.com>
Subject: **Re: Case files**

Thanks for the reply.
I will need a check for the money Hans Mast sent you regarding the McGuires insurance.
Paul

On Jul 20, 2015, at 7:24 AM, Brad Balke <brad@balkelaw.com> wrote:

Paul,

I never created an electronic file. I didn't need to. I gave you everything I had-I don't have anything else.

Anything that is incomplete is the way I got it.

Sorry I couldn't do more.

Brad

From: Paul Dulberg [<mailto:pdulberg@comcast.net>]
Sent: Saturday, July 18, 2015 9:51 AM
To: Brad J Balke
Subject: Re: Case files

Morning Brad,
Any chance I could get the electronic file anytime soon?
In the Paper file I received It appears that it is incomplete, sections of the depositions are missing as well as all the Dr's depositions.
Makes me wonder what else isn't included.
Any chance you have the complete file?
Thanks,
Paul

On Jul 16, 2015, at 1:02 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

Picked up the paper file...
What about the electronic file?

Paul Dulberg
847-497-4250
Sent from my iPad

On Jul 15, 2015, at 7:38 AM, Brad J Balke <brad@balkelaw.com> wrote:

The case file will be available at Donahue's office after 1pm today.

From: Paul Dulberg
Sent: Tuesday, July 14, 2015 1:56 PM
To: Brad Balke
Subject: Re: Case files

Hi Brad,
Just another reminder that I need the case file.
Paul

> On Jul 13, 2015, at 10:45 AM, Paul Dulberg <pdulberg@comcast.net> wrote:
>
> Hi Brad,
> When and where can I get both the electronic file and regular file?
> Thanks,
> Paul
>
> Paul Dulberg
> 847-497-4250
> Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Case files**
Date: December 27, 2016 2:12:22 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: July 20, 2015 at 8:07:04 AM CDT
To: Hans Mast <hansmast@att.net>
Subject: **Case files**

Hi Hans,

Sorry I need to bother you again.

I need your electronic case file for Paul Dulberg along with all paper files you have.

I did get the paper files from Brad Balke however of the plaintiffs/defendants depositions I received sections are missing in each and there are no dr's depositions at all. Brad promises he turned over everything he received from you.

Please collect all relevant information you have for this and notify me when it will be available to be picked up.

Thank you in advance for your help with this matter,

Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Mixed Documents**
Date: December 27, 2016 2:11:13 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: July 26, 2015 at 9:21:17 PM CDT
To: Brad Balke <brad@balkelaw.com>
Subject: **Mixed Documents**

Hi Brad,
I found some documents from Centegra concerning Kaitlyn D Welter mixed in with my case file.
If these are from one of your clients I can get these to you this week.
Please let me know if these are yours or not.
Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Mixed documents**
Date: December 27, 2016 2:11:46 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: July 26, 2015 at 8:57:36 PM CDT
To: Hans Mast <hansmast@att.net>
Subject: **Mixed documents**

Hi Hans,
I found some documents from Centegra concerning Kaitlyn D Welter mixed in with my case file.
If these are from one of your clients I can get these to you this week.
Please let me know if these are yours or not.
Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Case File**
Date: December 27, 2016 2:09:21 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: August 17, 2015 at 3:09:54 PM CDT
To: Hans Mast <hansmast@att.net>
Subject: **Re: Case File**

What company was hired to do the recordings for the medical depositions and what is their contact information?

Thanks again,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Aug 17, 2015, at 2:50 PM, Hans Mast <hansmast@att.net> wrote:

We gave you whatever we have. We probably didn't incur the expense for copies.

Sent from my iPhone

On Aug 17, 2015, at 2:40 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

Thank you in advance for sending the audio recording.

I noticed none of the medical depositions have been included in the file.
Do you have them?

Paul Dulberg
847-497-4250
Sent from my iPad

On Aug 17, 2015, at 2:19 PM, Hans Mast <hansmast@att.net> wrote:

We have obviously letters saved on our computer. Somethings are saved others are not. We gave you a copy of what we have. I will have Sheila send you a copy of the Recording of the telephone conversation..

Sent from my iPhone

On Aug 17, 2015, at 1:51 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

Hi Hans,

Thank you for another paper copy of my case file.
Does this exist in digital form?

Also, I will need the original audio recordings of the telephone conversations between yourself and David Gagnon you listed as Gagnon exhibit 2.

Thanks in advance,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Case File**
Date: December 27, 2016 2:09:50 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: August 17, 2015 at 2:40:46 PM CDT
To: Hans Mast <hansmast@att.net>
Subject: **Re: Case File**

Thank you in advance for sending the audio recording.

I noticed none of the medical depositions have been included in the file.
Do you have them?

Paul Dulberg
847-497-4250
Sent from my iPad

On Aug 17, 2015, at 2:19 PM, Hans Mast <hansmast@att.net> wrote:

We have obviously letters saved on our computer. Somethings are saved others are not. We gave you a copy of what we have. I will have Sheila send you a copy of the Recording of the telephone conversation..

Sent from my iPhone

On Aug 17, 2015, at 1:51 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

Hi Hans,

Thank you for another paper copy of my case file.
Does this exist in digital form?

Also, I will need the original audio recordings of the telephone conversations between yourself and David Gagnon you listed as Gagnon exhibit 2.

Thanks in advance,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Case File**
Date: December 27, 2016 2:10:19 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: August 17, 2015 at 1:51:16 PM CDT
To: Hans Mast <hansmast@att.net>
Subject: **Case File**

Hi Hans,

Thank you for another paper copy of my case file.
Does this exist in digital form?

Also, I will need the original audio recordings of the telephone conversations between yourself and David Gagnon you listed as Gagnon exhibit 2.

Thanks in advance,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical deposition information**
Date: December 27, 2016 2:07:35 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: August 20, 2015 at 1:58:51 PM CDT
To: Sheila Quinlan <sheilamquinlan@yahoo.com>
Subject: **Re: Medical deposition information**

Hi Sheila,

Thank you for the contact information.
I will be contacting them in the morning.

I'm still unclear as to who ordered the medical depositions be taken?

Thanks again,
Paul

On Aug 20, 2015, at 1:37 PM, Sheila Quinlan <sheilamquinlan@yahoo.com> wrote:

All the deposition transcripts we had were provided to Paul. The only court reporters used in this case were from Vahl Reporting 847/244-4117 and Urbanski Reporting 312/977-1777.

Sheila M. Quinlan
Law Offices of Thomas J. Popovich, P.C.
815.344.3797
815.344.5280 fax

On Thursday, August 20, 2015 11:51 AM, HANS MAST <hansmast@att.net> wrote:

paul I'll have my asst Sheila respond...im not sure...thanks

On Thursday, August 20, 2015 11:44 AM, Paul Dulberg <pdulberg@comcast.net> wrote:

Hi Hans,

I need the information requested in the email listed below.

Please let me know if you know who, how or where to obtain the depositions taken.

Did you order up those medical Depositions or did Gagnon or McGuire order those up?

If you don't know or don't have it that's ok, just say you don't know.

Thank you,
Paul

> On Aug 19, 2015, at 7:01 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

>

> Hi Hans,

>

> Please provide the contact information for the company or companies that recorded the medical depositions for each of the medical providers in Dulberg v. Gagnon et. al.

>

> Thank you in advance,

> Paul

>

> Paul Dulberg

> 847-497-4250

> Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical deposition information**
Date: December 27, 2016 2:08:09 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: August 20, 2015 at 11:44:54 AM CDT
To: Hans Mast <hansmast@att.net>
Subject: **Re: Medical deposition information**

Hi Hans,

I need the information requested in the email listed below.

Please let me know if you know who, how or where to obtain the depositions taken.

Did you order up those medical Depositions or did Gagnon or McGuire order those up?

If you don't know or don't have it that's ok, just say you don't know.

Thank you,
Paul

On Aug 19, 2015, at 7:01 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

Hi Hans,

Please provide the contact information for the company or companies that recorded the medical depositions for each of the medical providers in Dulberg v. Gagnon et. al.

Thank you in advance,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical deposition information**
Date: December 27, 2016 2:08:35 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: August 19, 2015 at 7:01:24 PM CDT
To: Hans Mast <hansmast@att.net>
Subject: **Medical deposition information**

Hi Hans,

Please provide the contact information for the company or companies that recorded the medical depositions for each of the medical providers in Dulberg v. Gagnon et. al.

Thank you in advance,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Medical Depositions**
Date: December 27, 2016 2:06:33 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: August 26, 2015 at 3:37:06 PM CDT
To: Hans Mast <hansmast@att.net>
Subject: **Medical Depositions**

Hans,

I have found in the paperwork you provided me of the notice of discovery for the Dr's depositions.

All of the paperwork clearly states they were to be deposed before Merrill Legal Solutions on various dates.

Upon contacting Merrill Legal Solutions, none of the Dr's depositions were recorded by that company. In fact, Merrill claims that they did not record any depositions in my case whatsoever.

So, what company did the recording of the Dr's depositions you claimed to have attended?

Paul

Paul Dulberg
847-497-4250

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **Fwd: Voice tape**
Date: December 27, 2016 2:05:33 PM CST
To: paul_dulberg@comcast.net

From: Paul Dulberg <pdulberg@comcast.net>
Date: September 11, 2015 at 1:35:46 PM CDT
To: Hans Mast <hansmast@att.net>
Subject: **Voice tape**

Hi Hans,
Still Haven't received the actual voice tape/recording listed as gagnon exhibit 2.
I can pick it up, please let me know when.
Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: "Myrna Boyce" <myrna@blgltd.com>
Subject: **Fwd: Dulberg v. Gagnon**
Date: October 19, 2016 5:08:56 PM CDT
To: "Paul Dulberg" <pdulberg@comcast.net>
▶ 3 Attachments, 502 KB

Paul:

This came in today so I wanted to get this to you for your review, attached is the report from your IME exam. The attorneys are also reviewing the report and said they would get in contact with you tomorrow regarding the results.

Myrna

Myrna E. Boyce, Legal Assistant



Myrna E. Boyce, Legal Assistant | The Baudin Law Group, Ltd. | 304 S. McHenry Ave., Crystal Lake, IL 60014
Direct 779.994.4637 | T 815.526.3202 | T 312.866.1411 | F (312) 800-7494 | www.blgltd.com

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[ExpertReport...pdf \(236 KB\)](#) [PHILLIPS, Cra...pdf \(208 KB\)](#)

From: Zenia Brezden <zbrezden@fdaleylaw.com>
Subject: RE: SSDI authorization letter
Date: November 2, 2016 10:21:43 AM CDT
To: Paul Dulberg <pdulberg@comcast.net>

Okay. Thank you!

Zenia

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

From: Paul Dulberg [mailto:pdulberg@comcast.net]
Sent: Wednesday, November 02, 2016 8:25 AM
To: Zenia Brezden <zbrezden@fdaleylaw.com>
Cc: Meredith Marcus <mmarcus@fdaleylaw.com>
Subject: Re: SSDI authorization letter

Hi,
Sorry, I forgot to email you back on this.
It was mailed last Saturday.
Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

On Oct 28, 2016, at 4:12 PM, Zenia Brezden <zbrezden@fdaleylaw.com> wrote:

The Authorization form (SSA-827) is for you to sign, date and return to SSA. Also, if you have a witness, please have them sign also.
Thank you!

Zenia Brezden
Case Manager
Daley Disability Law, P.C.
601 W. Randolph St., Suite 300
Chicago, IL 60661
(312)561-3030 (x219)
F (312)284-4773

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

From: Paul Dulberg [mailto:pdulberg@comcast.net]
Sent: Friday, October 28, 2016 4:10 PM
To: Meredith Marcus <mmarcus@fdaleylaw.com>; Zenia Brezden <zbrezden@fdaleylaw.com>
Subject: SSDI authorization letter

Hi Meredith,
Today I received a letter for authorization to disclose information to SSA.
The letter was addressed to your office.
Should I sign and return the letter or have you already taken care of this?
Thanks,
Paul

Paul Dulberg
847-497-4250

From: Zenia Brezden <zbrezden@fdaleylaw.com>
Subject: **RE: SSDI authorization letter**
Date: October 28, 2016 4:12:55 PM CDT
To: Paul Dulberg <pdulberg@comcast.net>
Cc: Meredith Marcus <mmarcus@fdaleylaw.com>

The Authorization form (SSA-827) is for you to sign, date and return to SSA. Also, if you have a witness, please have them sign also. Thank you!

Zenia Brezden
Case Manager
Daley Disability Law, P.C.
601 W. Randolph St., Suite 300
Chicago, IL 60661
(312)561-3030 (x219)
F (312)284-4773

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

From: Paul Dulberg [mailto:pdulberg@comcast.net]
Sent: Friday, October 28, 2016 4:10 PM
To: Meredith Marcus <mmarcus@fdaleylaw.com>; Zenia Brezden <zbrezden@fdaleylaw.com>
Subject: SSDI authorization letter

Hi Meredith,
Today I received a letter for authorization to disclose information to SSA.
The letter was addressed to your office.
Should I sign and return the letter or have you already taken care of this?
Thanks,
Paul

Paul Dulberg
847-497-4250

From: Herb <herb9999@yahoo.com>
Subject: **Fwd: Dr. Visit**
Date: November 3, 2016 9:03:54 AM CDT
To: Paul Dulberg <pdulberg@comcast.net>
▶ 1 Attachment, 58.5 KB

Paul Dulberg
847-497-4250
Sent from my iPad

Begin forwarded message:

From: "Myrna Boyce" <myrna@blgltd.com>
Date: November 2, 2016 at 3:31:04 PM CDT
To: "Herb" <herb9999@yahoo.com>
Subject: **RE: Dr. Visit**

Paul:

Thanks for the email with the appointment information- sorry I didn't see this sooner. I was out and am just getting caught up on emails and somehow I missed this one right away.

We will send over a copy of the report to Dr. Kujawa for review prior to your appointment.

Myrna

Myrna E. Boyce, Legal Assistant



Myrna E. Boyce, Legal Assistant | The Baudin Law Group, Ltd. | 304 S. McHenry Ave., Crystal Lake, IL 60014
Direct 779.994.4637 | T 815.526.3202 | T 312.866.1411 | F (312) 800-7494 | www.blgltd.com

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

Subject: Dr. Visit
From: "Herb" <herb9999@yahoo.com>
Date: 10/28/16 1:46 pm
To: "Myrna Boyce" <myrna@lawbaudin.com>, "Myrna Boyce" <myrna@blgltd.com>

Hi Myrna,
Apparently Barb, my mom, called and talked to Kelly today.
Barb told me that Kelly would like me to make an appointment with Dr. Kujawa before the mediation.
I did make a new appointment.
It's November 11th at 11:30 am.

Did we send Dr. Kujawa the Independent Medical examination report or am I supposed to take it with me to the appointment?

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: "Myrna Boyce" <myrna@blgltd.com>
Subject: **RE: Dr Kujawa visit tomorrow**
Date: November 10, 2016 5:24:37 PM CST
To: "Paul Dulberg" <pdulberg@comcast.net>
▶ 1 Attachment, 58.5 KB

Paul:

I forwarded the IME to her office a week or so ago and left a message for her nurse stating we were requesting her to review the report prior to your appointment this week.

There's nothing in particular that you need to ask her. After your appointment, Randy and Kelly will be contacting her to see if she has any commentary regarding the report or if any of her opinions have changed and/or why. They wanted her to be the most recent doctor to see you prior to the mediation and wanted her to see you again since the IME.

Randy will not be attending your appointment tomorrow though.

Myrna

Myrna E. Boyce, Legal Assistant



Myrna E. Boyce, Legal Assistant | The Baudin Law Group, Ltd. | 304 S. McHenry Ave., Crystal Lake, IL 60014
Direct 779.994.4637 | T 815.526.3202 | T 312.866.1411 | F (312) 800-7494 | www.blgltd.com

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

Subject: Dr Kujawa visit tomorrow
From: "Paul Dulberg" <pdulberg@comcast.net>
Date: 11/10/16 3:37 pm
To: "Myrna Boyce" <myrna@lawbaudin.com>, "Myrna Boyce" <myrna@blgltd.com>

Hi Myrna,
Tomorrow I'm visiting Dr. Kujawa.
Is there anything Randy or Kelly would like me to bring up with Dr. Kujawa?

Also, will Randy be there like he was at that farce insurance examination we had to endure?

Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: "Myrna Boyce" <myrna@blgltd.com>
Subject: **RE: Adr meeting**
Date: December 1, 2016 11:53:18 AM CST
To: "Paul Dulberg" <pdulberg@comcast.net>
▶ 1 Attachment, 58.5 KB

Paul:

They would like to meet at 12:30 the day of the arb- at the same location as the arb will be held at ADR Systems.
Would that be okay for you to meet them there by 12:30?

Thanks,

Myrna

Myrna E. Boyce, Legal Assistant



Myrna E. Boyce, Legal Assistant | The Baudin Law Group, Ltd. | 304 S. McHenry Ave., Crystal Lake, IL 60014
Direct 779.994.4637 | T 815.526.3202 | T 312.866.1411 | F (312) 800-7494 | www.blgltd.com

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

Subject: Adr meeting
From: "Paul Dulberg" <pdulberg@comcast.net>
Date: 12/1/16 9:03 am
To: "Myrna Boyce" <myrna@lawbaudin.com>, "Myrna Boyce" <myrna@blgltd.com>

Morning Myrna,
Does Randy and Kelly have plans to meet with me prior to the ADR meeting?
Thanks,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: "Myrna Boyce" <myrna@bgltd.com>
Subject: **FWD: Incoming Fax from <unspecified> (8476402112)**
Date: December 2, 2016 5:03:57 PM CST
To: pdulberg@comcast.net
▶ 2 Attachments, 94.6 KB

Paul:

I am forwarding you the letter that we received from Dr. Kujawa.

Myrna

Myrna E. Boyce, Legal Assistant



Myrna E. Boyce, Legal Assistant | The Baudin Law Group, Ltd. | 304 S. McHenry Ave., Crystal Lake, IL 60014
Direct 779.994.4637 | T 815.526.3202 | T 312.866.1411 | F (312) 800-7494 | www.bgltd.com

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

Subject: Incoming Fax from <unspecified> (8476402112)
From: donotreply@faxthruemail.com
Date: 11/22/16 2:20 pm
To: copier@bgltd.com

You have received the attached document as a fax.

Thank you,
The Fax Thru Email Team

This email was sent from a notification-only address. Please do not reply to this message. For assistance or other customer service inquiries, please visit (<http://support.godaddy.com/support?ci=22414&tab=3>).



[incomingFax.pdf \(36.1 KB\)](#)

From: Zenia Brezden <zbrezden@fdaleylaw.com>
Subject: RE: SSDI
Date: December 2, 2016 10:06:27 AM CST
To: Paul Dulberg <pdulberg@comcast.net>
Cc: Meredith Marcus <mmarcus@fdaleylaw.com>

Your case is in prehearing review as of 10/28/16. I don't think it will be much longer but we have to wait for the judge's scheduler to call us. It all depends on the judge's schedule and order of cases to be scheduled. They schedule the older cases first. We will notify you as soon as we get a date.

Zenia Brezden
Case Manager
Daley Disability Law, P.C.
601 W. Randolph St., Suite 300
Chicago, IL 60661
(312)561-3030 (x219)
F (312)284-4773

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

From: Paul Dulberg [mailto:pdulberg@comcast.net]
Sent: Friday, December 02, 2016 9:14 AM
To: Zenia Brezden <zbrezden@fdaleylaw.com>; Meredith Marcus <mmarcus@fdaleylaw.com>
Subject: SSDI

Hi Meredith and Zenia,

Hope both of you had a wonderful Thanksgiving.
Have we heard anything about when the SSDI hearing will be?

Thanks,
Paul

Paul Dulberg
847-497-4250

From: "Myrna Boyce" <myrna@blgltd.com>
Subject: RE: Fwd: List of former hobbies for Kelly
Date: December 5, 2016 5:18:58 PM CST
To: "Paul Dulberg" <pdulberg@comcast.net>
▶ 1 Attachment, 58.5 KB

Paul:

Thanks for the additional information!

We are working on your case now so that we have everything in order for the mediation this week.

Myrna E. Boyce, Legal Assistant



Myrna E. Boyce, Legal Assistant | The Baudin Law Group, Ltd. | 304 S. McHenry Ave., Crystal Lake, IL 60014
Direct 779.994.4637 | T 815.526.3202 | T 312.866.1411 | F (312) 800-7494 | www.blgltd.com

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

Subject: Fwd: List of former hobbies for Kelly
From: "Paul Dulberg" <pdulberg@comcast.net>
Date: 12/5/16 5:13 pm
To: "Myrna Boyce" <myrna@lawbaudin.com>, "Myrna Boyce" <myrna@blgltd.com>

Ok got to break that promise and make a new one.
I can't help myself cause it's been 51/2 years since I did these hobbies.
Bowling, I was good at it and did it once a week since I was a kid till this happened.
Ok that's all for today but the list of things I used to be able to do is a long one. Sorry

Paul Dulberg
847-497-4250
Sent from my iPad

Begin forwarded message:

From: Paul Dulberg <pdulberg@comcast.net>
Date: December 5, 2016 at 4:58:19 PM CST
To: Myrna Boyce <myrna@lawbaudin.com>, Myrna Boyce <myrna@blgltd.com>
Subject: Fwd: List of former hobbies for Kelly

Last one to that list for today, I promise!
I don't think this is considered a hobby but it's important
I miss being playful with all of my nieces and nephews.
I can't pick them up and turn them upside down or tickle them to death without cramping up anymore. I feel like I have to distance myself from a huge part of my family and it bothers me all the time

Paul Dulberg

847-497-4250
Sent from my iPad

Begin forwarded message:

From: Paul Dulberg <pdulberg@comcast.net>
Date: December 5, 2016 at 4:44:23 PM CST
To: Myrna Boyce <myrna@lawbaudin.com>, Myrna Boyce <myrna@blqltd.com>
Subject: Fwd: List of former hobbies for Kelly

One more thing I totally forgot about cause I just can't do it anymore but used to do at least twice a year, usually more.
Rock face climbing and rappelling

Paul Dulberg
847-497-4250
Sent from my iPad

Begin forwarded message:

From: Paul Dulberg <pdulberg@comcast.net>
Date: December 5, 2016 at 4:31:29 PM CST
To: Myrna Boyce <myrna@lawbaudin.com>, Myrna Boyce <myrna@blqltd.com>
Subject: Fwd: List of former hobbies for Kelly

Oh, add walking, brushing and playing fetch for more than a few minutes with the dogs to that list.
Another item for the dogs is getting their food. Moving Large bags of dog-food from in the store to the car then into the house and up a flight of stairs is something I have a lot of trouble with. It's why Dr. Kujawa got me the handicap placard for my car.

Paul Dulberg
847-497-4250
Sent from my iPad

Begin forwarded message:

From: Paul Dulberg <pdulberg@comcast.net>
Date: December 5, 2016 at 2:35:09 PM CST
To: Myrna Boyce <myrna@lawbaudin.com>, Myrna Boyce <myrna@blqltd.com>
Subject: List of former hobbies for Kelly

Hi Myrna,
Kelly was asking what hobbies I had prior to the accident so I started a list.
All of the following are things I used to do that are now affected or altogether stopped after the accident.
This is the quick short list.

Camping, Canoeing & Fishing
Vegetable gardening & other yard work
Cooking, Baking, Candies & canning
Motor Sports, boating, ATV & motor cross, snowmobile

Water Sports, skiing, tubing, etc...
Winter sports, skiing, tubing, snowmobile, etc...
Building, maintaining and repairing motors on cars motorcycles
lawn mowers and boats
Playing Guitar
Off road Bicycle riding
Building, repairing, remodeling and maintaining my home
Art, Design & Sketching
Photography
Typing
Writing

Like I said earlier, this is a short list. I had a lot of hobbies but
these are the ones that I remember the most and miss

Hope this helps,
Paul

Paul Dulberg
847-497-4250
Sent from my iPad

From: Randy Baudin II <randybaudin2@gmail.com>
Subject: **award**
Date: December 12, 2016 7:34:42 PM CST
To: pdulberg@comcast.net
▶ 1 Attachment, 45.2 KB

Congrats!!



[W. Randal Baudin II's LinkedIn Profile](#)
Cell 815.814.2193

Dec 12 2016 3:06PM HP Fax

page 2



Binding Mediation Award

Paul Dulberg

v.

David Gagnon

ADR Systems File # 33391BMAG

On December 8, 2016, the matter was called for binding mediation before the Honorable James P. Etchingham, (Ret.), in Chicago, IL. According to the agreement entered into by the parties, if a voluntary settlement through negotiation could not be reached the mediator would render a settlement award which would be binding to the parties. Pursuant to that agreement the mediator finds as follows:

Finding in favor of:

Paul Dulberg

Gross Award:

\$660,000.

Comparative fault:

15

% (if applicable)

Net Award:

\$561,000

Comments/Explanation

Medical

\$ 60,000.

Future medical

\$ 200,000.

Lost wage

\$ 250,000.

P & S

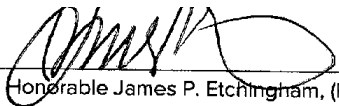
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L & L

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n.



The Honorable James P. Etchingham, (Ret.)

ADR Systems • 20 North Clark Street • Floor 29 • Chicago, IL 60602
312.960.2260 • info@adrsystems.com • www.adrsystems.com

From: Paul Dulberg <pdulberg@comcast.net>
Subject: Fwd: award
Date: December 13, 2016 10:48:50 AM CST
To: paul_dulberg@comcast.net
▶ 1 Attachment, 45.2 KB

Paul Dulberg
847-497-4250
Sent from my iPad

Begin forwarded message:

From: Randy Baudin II <randybaudin2@gmail.com>
Date: December 12, 2016 at 7:34:42 PM CST
To: pdulberg@comcast.net
Subject: award

Congrats!!



[W. Randal Baudin II's LinkedIn Profile](#)
Cell 815.814.2193

Dec 12 2016 3:06PM HP Fax

page 2



Binding Mediation Award

Paul Dulberg

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Paul Dulberg

Gross Award:

\$660,000.

Comparative fault:

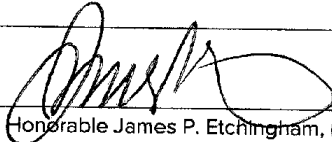
15

% (if applicable)

Net Award:

\$561,000

Comments/Explanation	Medical	\$ 60,000.
	Future medical	\$ 200,000.
	Lost wage	\$ 250,000.
	PIS	75,000.
	LNL	75,000.


 The Honorable James P. Etchingham, (Ret.)

From: Randy Baudin II <randybaudin2@gmail.com>
Subject: **release**
Date: December 20, 2016 12:16:34 PM CST
To: pdulberg@comcast.net
▶ 1 Attachment, 360 KB

Dear Paul:

Please sign the attached release and scan it back to me asap. Additionally, initial on the line on the front next to the address correction.

I also have to send it to the trustee.

Thanks, Randy



[W. Randal Baudin II's LinkedIn Profile](#)
Cell 815.814.2193



[Dulburg Rele...pdf \(360 KB\)](#)

From: Paul Dulberg <pdulberg@comcast.net>
Subject: **missing emails**
Date: December 29, 2016 11:43:11 AM CST
To: Paul_Dulberg@comcast.net
Reply-To: Paul Dulberg <pdulberg@comcast.net>
▶ 1 Attachment, 981 KB

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Subject: Missing emails
Date: December 29, 2016 11:45:19 AM CST
To: Paul Dulberg <pdulberg@comcast.net>
▶ 1 Attachment, 981 KB

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