

From: Paul Dulberg Paul_Dulberg@comcast.net
Subject: Dulberg Case
Date: October 10, 2019 at 2:01 PM
To: Julia Williams juliawilliams@clintonlaw.net
Cc: Mary Winch marywinch@clintonlaw.net, Ed Clinton ed@clintonlaw.net

PD

Hi Julia,

It's been just over a month since the last court date and a little less than a month away from the next court date.
Thought we should touch base.

Mary Winch sent an email asking that I call you about the new motion by the defense.
I emailed you and called but haven't heard back

Below are 5 outstanding questions

1. Did the defense release any of the blacked out documents or provide a privilege log or list of the documents it's withholding?

If yes, please forward a copy to me

If no, when will we be receiving the documents, a privilege log or a valid explanation for withholding the blacked out documents?

2. Did we subpoena the principals and other subordinates of the Popovich Firm for any communications or memorandums, etc.. on the Dulberg case?

If yes, have we received any of these documents?

If no, when will we be asking for these documents?

3. Did we subpoena the Attorney Barch with Auto-owners insurance for his communications with the Popovich Firm concerning the Dulberg case?

If yes, have we received any of these documents?

If no, when will we be asking for these documents?

4. Have we subpoenaed Attorneys Mr Accardo & Ms Reddington with Allstate Insurance for their communications with the Popovich Firm concerning the Dulberg case?

If yes, have we received any of these documents?

If no, when will we be asking for these documents?

5. Have we subpoenaed the Bankruptcy Trustees Heeg and (I need to look up the names in the Bankruptcy docs) for their communications with the Popovich Firm concerning the value of the Dulberg case/asset?

If yes, have we received any of these documents?

If no, when will we be asking for these documents?

Thanks,
Paul

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