From: Julia Williams juliawilliams@clintonlaw.net &

Subject: Re: Barch Documents

Date: February 12, 2020 at 1:29 PM

To: Paul Dulberg Paul_Dulberg@comcast.net

Cc: Ed Clinton ed@clintonlaw.net, Mary Winch marywinch@clintonlaw.net

Dear Paul,

We can move Hans Mast and Tom Popovich to the end of March.

Defense counsel will not agree to move your deposition and would file a motion to compel.

At this stage, I think it makes sense for you to go ahead and sit for your deposition on Feb. 19 at 1pm; we will prepare on Feb. 18 at our office at 1pm.

For Feb. 19, I propose we meet here, at our office at 12:30 and walk to Karbal together.

As an FYI, here is the information for opposing counsel's office:

George Flynn

Karbal | Cohen | Economou | Silk | Dunne | LLC

150 S. Wacker Drive Suite 1700 Chicago, IL 60606

P: (312) 431-3622
F: (312) 431-3670

E: gflynn@karballaw.com

Best Regards,

Julia Williams
Of Counsel
The Clinton Law Firm
111 W. Washington, Ste. 1437
Chicago, IL 60602
P:312.357.1515
F: 312.201.0737
juliawilliams@clintonlaw.net

This message may be privileged and confidential. If you are not the intended recipient, please delete the email and notify the sender immediately.

On Feb 12, 2020, at 12:26 PM, Paul Dulberg < Paul_Dulberg@comcast.net > wrote:

Hi Julia,

Due to the significants of the October 22, 2013 letter between Mast/Popovich and Ronald Barch/Auto-Owners I feel that the documents and communications between Mast and Barch are essential to have prior to any depositions.

When can we get them?

Paul







