

**IN THE TWENTY-SECOND JUDICIAL CIRCUIT
MCHENRY COUNTY, ILLINOIS**

PAUL DULBERG,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	CASE NO. 17 LA 377
	)	
THE LAW OFFICES OF THOMAS J.	)	JUDGE THOMAS A. MEYER
POPOVICH, P.C., and HANS MAST,	)	
	)	
Defendants.	)	

RESPONSE TO SUBPOENA FOR DOCUMENTS
(THIS SUBPOENA IS FOR RECORDS ONLY.)

Edward X. Clinton, Jr., individually as manager of Clinton Law Firm, LLC, and Julia C. Williams, individually, as attorney at Clinton Law Firm, LLC and as manager of Williams Law, LLC, (hereinafter “Respondents”) respond to the Subpoena for Documents as follows:

GENERAL OBJECTIONS

Respondents object to all requests that seek the disclosure of attorney-client communications between Respondents and their former client Paul Dulberg.

Respondents object to all requests that seek the disclosure of attorney work product.

RESPONSES

Respondent incorporate the general objections in to each response to requests 1-7, and further respond as follows:

1. The original transcript stamped “Original” of the discovery deposition of Hans Mast taken in this matter on June 25, 2020 including all pages, all indexes, all exhibits and all stenographic/shorthand notes.

The transcript of the deposition of Hans Mast is produced with this response in pdf format and titled "Hans Mast 062520 FULL.pdf" and "Hans Mast 062520 MINI.pdf." The exhibits to the deposition are produced with Bates Stamp Dulberg Clinton Subpoena 518-562, 616-642. No such "original" stamp or "copy" stamp is attached to the transcript as the transcript was produced in an electronic format.

2. An exact duplicate of the original transcript stamped "Copy" of the discovery deposition of Hans Mast taken on June 25, 2020, to include but not limited to: all pages, all indexes, all exhibits and all stenographic/shorthand notes. Please note that the copy demanded is a contemporaneous copy issued by U.S. Legal Support.

The transcript of the deposition of Hans Mast is produced with this response in pdf format and titled "Hans Mast 062520 FULL.pdf" and "Hans Mast 062520 MINI.pdf." The exhibits to the deposition are produced with Bates Stamp Dulberg Clinton Subpoena 518-562, 616-642. No such "original" stamp or "copy" stamp is attached to the transcript as the transcript was produced in an electronic format.

3. An exact duplicate of the original transcript stamped "Copy" in condensed format (mini) of the discovery deposition of Hans Mast taken on June 25, 2020, to include but not limited to: all pages, all indexes, all exhibits and all stenographic/shorthand notes. Please note that the condensed transcript demanded is a contemporaneous version issued by U.S. Legal Support.

The transcript of the deposition of Hans Mast is produced with this response in pdf format and titled "Hans Mast 062520 FULL.pdf" and "Hans Mast 062520 MINI.pdf." The exhibits to the deposition are produced with Bates Stamp Dulberg Clinton Subpoena 518-562, 616-642. No such "original" stamp or "copy" stamp is attached to the transcript as the transcript was produced in an electronic format.

4. All documents and ESI to include but not limited to: all text messages, emails, messages, notes, and reports taken, created, or received concerning the discovery deposition of Hans Mast taken on June 25, 2020.

See documents Bates Stamped Dulberg Clinton Subpoena 1-671.

5. All documents and ESI to include but not limited to: all text messages, emails, messages, notes, and reports taken, created, or received concerning Exhibit 12 of the discovery deposition of Hans Mast taken on June 25, 2020.

See documents Bates Stamped Dulberg Clinton Subpoena 1-671.

6. All documents and ESI to include but not limited to: all text messages, emails, messages, notes, and reports taken, created, or received concerning the exhibit titled " Legal Research" of discovery deposition of Hans Mast taken on June 25, 2020.

See documents Bates Stamped Dulberg Clinton Subpoena 1-671.

7. All documents and ESI to include but not limited to: all text messages, emails, messages, notes, and reports taken, created, or received concerning Exhibits 1-11 and 13-15 of the discovery deposition of Hans Mast taken on June 25, 2020.

See documents Bates Stamped Dulberg Clinton Subpoena 1-671.

Affidavit of Compliance

The undersigned certifies under penalties of perjury as provided by law pursuant to the Illinois Code of Civil Procedure, 735 ILCS 5/1-109, that the statements checked below are true and correct.

Check one (1) from the following:

 x After making a diligent search of any and all the records in our possession or control, I certify that all records we have on the above are submitted herewith in response to this subpoena.

 After making a diligent search of any and all records, I certify there are no records to provide in response to this subpoena.

Check one (1) from the following:

 x I have personal knowledge of the record-keeping procedures of the Clinton Law Firm, LLC and Julia Christine Williams and Williams Law LLC and the manner of creation for all records produced responsive to this subpoena.

 I am an employee of or manager of Edward X. Clinton and Clinton Law Firm LLC, and I have personal knowledge of the record-keeping procedures of Edward X. Clinton and Clinton Law Firm LLC and the manner of creation for all records produced responsive to this subpoena.

 I have no personal knowledge of the record-keeping procedures of Edward X. Clinton and Clinton Law Firm LLC and the manner of creation for all records produced responsive to this subpoena.

Check **all** that apply from the following:

 x The records produced in response to this subpoena were kept in the course of the regularly conducted activity of Edward X. Clinton, Clinton Law Firm LLC, Julia C. Williams, and Williams Law LLC.

 x The records produced in response to this subpoena were made by the regularly conducted activity as a regular practice of Edward X. Clinton, Clinton Law Firm LLC, Julia C. Williams, and Williams Law LLC.

_____ The records produced in response to this subpoena were made at or near the time of the occurrences set forth by, or from information transmitted by, a person with knowledge of the matters set forth within the records.

Date: September 29, 2022

Position: Attorney

Name: Julia C. Williams

(Print)
Julia C. Williams
(Signature)