

From: PAUL DULBERG paul_dulberg@comcast.net 
Subject: Re: Legal Malpractice Case
Date: November 1, 2018 at 4:31 PM
To: Ed Clinton ed@clintonlaw.net, Julia Williams juliawilliams@clintonlaw.net
Cc: Mary Winch marywinch@clintonlaw.net

PD

Thank you for explaining it.
Hopefully everything goes smooth.
Thank you,
Paul

On November 1, 2018 at 2:45 PM Ed Clinton <ed@clintonlaw.net> wrote:

Generally, the lien of a prior attorney is dealt with at the end of the case.

It does not make sense to deal with it now, as we don't know what the recovery will be or how much work we will do.

Ed Clinton

On Nov 1, 2018, at 2:35 PM, Julia Williams <juliawilliams@clintonlaw.net> wrote:

The agreement that I sent does not address any issues with the Gooch firm. We will need to discuss that once we see what arises. I suspect their will not be an issue with getting the files etc.

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

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On Nov 1, 2018, at 2:31 PM, PAUL DULBERG <paul_dulberg@comcast.net> wrote:

Hi Julia,
I wouldn't expect the Gooch firm would give us a hard time with either the lien, case files, email correspondence, expert witnesses they consulted or the monies the Gooch firm already collected from me to date.
But if there is a problem, does our agreement include settling any disputes with the Gooch firm so we can move forward or do I need to retain you to handle that as a separate matter?
Thank you,
Paul

On November 1, 2018 at 1:17 PM PAUL DULBERG <paul_dulberg@comcast.net> wrote:

Hi Julia,

Please find the attached pdf file of the October 15th Order.
If you have any issues opening the attachment please let me know.

Thank you,
Paul

On November 1, 2018 at 9:59 AM Julia Williams <juliawilliams@clintonlaw.net> wrote:

Dear Paul,

We can get the file from your prior counsel when we file an appearance. We may have to get a signed release from you, but we'll see if we can get it without. If we get things electronically, we will forward them to you.

If you have a copy of the last court order that you could forward that would be helpful. We will likely need to get extra time to file the new complaint as I want to make sure we are completely up to speed and are filing the right facts.

Best Regards,

Julia Williams
Of Counsel
The Clinton Law Firm
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On Nov 1, 2018, at 7:18 AM, PAUL DULBERG <paul_dulberg@comcast.net> wrote:

Good Morning Julia,

Thank you for accepting me as a client.

I am having the retainer agreement printed out today and should have it signed and mailed to you with a check for the agreed amount by tomorrow or Saturday.

If it helps, Just give me an estimate and I can include a separate check for future anticipated expenses in advance with the retainer.

Also, do I need to get the case file from The Gooch Firm or is that something you will work out with them?

For your information,
The Gooch Firm also has all the supporting documents including but not limited to the following;

Scanned in Case files from both the Popovich Firm and the Baudin Firm, all emails between myself and Hans Mast from the Popovich firm with my emails to the Gooch firm identifying which of hundreds are the critical emails showing the false choices Hans Mast pushed along with the emails assuring me that the Popovich firm handled the matter correctly long after the McGuires were dismissed, Disability determination, Solvent Bankruptcy Documents that prove every creditor including medical was paid in full, ADR award, all emails from myself to the Gooch firm answering all their

ADR award, all emails from myself to the Gooch firm answering all their questions, etc...

I would like to get a digital copy of everything the Gooch firm turns over because I should be able to provide anything they missed.

Thank you,
Paul

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

On October 31, 2018 at 11:45 AM Julia Williams <juliawilliams@clintonlaw.net> wrote:

Dear Paul,

Attached is the retainer contract that may be returned via email, fax, or mail (a scanned signature is fine).

We are looking for \$5,000 upfront to pay for costs associated with the case.

Finally, your prior counsel likely has a lien on the case. We do not address that at all in this retainer and we'll discuss it again when the issue arises.

Best Regards,

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

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