

From: Paul Dulberg pdulberg@comcast.net
Subject: Re: Dulberg v Popovich Updated Discovery
Date: May 28, 2019 at 6:01 PM
To: The Clinton Law Firm juliawilliams@clintonlaw.net
Cc: Ed Clinton ed@clintonlaw.net, Mary Winch marywinch@clintonlaw.net

PD

Hi Julia,
I want to touch base because I'm reading this again and I see a few other things that perhaps should change.
I will have an email with the corrections by tomorrow morning.
Thanks,
Paul

On May 28, 2019, at 2:35 PM, Julia Williams <juliawilliams@clintonlaw.net> wrote:

Dear Paul,

Please find updated responses.

Please note that after our call I determined that we should retain Dr. Landford before disclosing him as an expert witness. We have time to do that.

As to the owner's manual—it would not be considered a photograph—the photographs of the machine in it are not the types of photographs the defendants are looking for. They want actual physical photos at the scene.

Thanks,

Julia Williams
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<Dulberg Answers to Thomas Popovich Expert Interrogatories SKELETON DRAFT 2019 May 28.docx><Dulberg's Answers to Popovich Interrogatories to Plaintiff 2019 May 28.docx>