

From: Julia Williams juliawilliams@clintonlaw.net
Subject: Re: Dulberg v Mast et al; Def. redactions
Date: November 5, 2019 at 10:24 AM
To: Paul Dulberg Paul_Dulberg@comcast.net
Cc: Ed Clinton ed@clintonlaw.net, Mary Winch marywinch@clintonlaw.net

JW

Hi Paul,

Thanks for the info. I agree with your assessment, it makes sense. Also, it appears that there are too many to have redacted the "file folder" page. More to come on this.

Best Regards,

Julia Williams
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On Nov 1, 2019, at 7:22 PM, Paul Dulberg <Paul_Dulberg@comcast.net> wrote:

Hi Julia,

A note on Mr Flynn's claim that the black boxes are photocopies of file dividers:

1. I am a professional Graphic Designer
2. I opened each of the blacked out pages in both Adobe Photoshop and Adobe Illustrator
3. In Illustrator the box appears to be a vector graphic or object, not a rasterized image, scan or photocopy
4. In Photoshop I used the info palette and eyedropper tool and cannot detect any fluctuation in color. The color is perfectly uniform throughout. This is not possible from a scanned image or photocopy.
5. I will state unequivocally that the black box on each page is generated digitally and placed in the file. Meaning it is not a scan or photocopy of a file divider or anything else.

Please feel free to ask any Professional Graphic Designer their professional opinion.

Thank you,
Paul

On Oct 31, 2019, at 10:46 AM, Julia Williams <juliawilliams@clintonlaw.net> wrote:

Dear Paul,

Our office will be attending the hearing on Monday by telephone. You need not attend, but if you wish too, you are welcome to appear in person.

Mr. Flynn will likely be there. I strongly recommend that you do not talk to him without us present. For ethical reasons, he cannot speak with you without our consent. I believe you are already aware of all of this, but just a friendly reminder.

Also, here is the response to the redactions, but I am going to review them again just to be sure that it does look like file splits:
Julia:

I have confirmed that the blank pages in Popovich's discovery are photocopies of file dividers. The blank pages were contained in the disc that was sent to me at my prior firm. We included them in the production only because they were included in the documents transmitted to me.

them in the production only because they were included in the documents transmitted to my office. There have been no redactions made by the clients or by our office, besides the redaction of deductible and premium information from the insurance policy declarations page.

Please feel free to contact me if you have any further questions.

Best regards,

George Flynn

Karbal | Cohen | Economou | Silk | Dunne | LLC

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<envelope_5540fafc-2f13-4c5f-af64-a2c20113037b.png> E: gflynn@karballaw.com

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Best Regards,

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