From: **Paul Dulberg** Paul_Dulberg@comcast.net
Subject: Re: Barch Documents
Date: February 13, 2020 at 2:38 PM
To: Ed Clinton ed@clintonlaw.net
Cc: The Clinton Law Firm juliawilliams@clintonlaw.net, Mary Winch marywinch@clintonlaw.net

PD

Hi Ed,

I did not address the demand portion of your email.

We should have the entire Popovich policy before moving forward on this.

Popovich only supplied the declaration pages in the document disclosure.

Are we not entitled to see the entire policy?

Thanks,
Paul

> On Feb 13, 2020, at 1:29 PM, Paul Dulberg <Paul_Dulberg@comcast.net> wrote:
>
> Hi Ed,
>
> I agree with everything you wrote.
>
> I can only testify to what I know.
>
> As of July 2019, I now know about the October 22, 2013, $7500 offer Mast made to Barch without my knowledge.
>
> We need to confirm this letter is real by acquiring the Barch firms documents and communications with Mast by compelling them if necessary.
>
> I have been asking for the Barch communications and documents since last July.
>
> Why hasn't Barch turned over those communications and documents?
>
> Do we need to be concerned that Barch feels those documents may implicate himself somehow or has he made a backroom deal of some sort with Mast/Popovich?
>
> The only reluctance that I have is the amount of time Mast and Popovich will have to both read and formulate a strategy before being deposed themselves.
>
> I have learned the hard way not to trust these two gentlemen (Mast & Popovich) and have cause for concern or we wouldn't be here.
>
> In the underlying case, after reading Caroline McGuires deposition it became obvious to both myself and Mast that she had read my deposition prior to her being deposed.
>
> Caroline McGuire described my description of the chainsaw incident.
>
> After I realized that Caroline McGuire had information that she would not otherwise have had or possibly known before being deposed I learned to never let that happen again.
>
> It is not fair that the defense witnesses get to read my testimony/deposition before giving their own testimony/deposition.
>
> Even if the defense witnesses don't read my deposition directly I'm positive they will be briefed by their counsel on the key points they need to address.
>
> Given enough time they (Mast & Popovich) will develop an alternative fictional half truth as a strategy.
>
> Fictional half truths is exactly what Mast and Popovich did to me when they lied and bullied me into settling with the McGuires.
>
> These two gentlemen (Mast and Popovich) have a proven track record of deceiving and lying to me so why would I believe documents they turn over without confirming them by getting those records from Barch?

If we need to postpone Mast and Popovich's depositions by a month because we haven't received the Barch communications then it seems only fair that my deposition is also postponed.

I don't know if Mast turned over all the communications and documents with Barch or not, the only way to find out is to see what Barch has, who knows what else those documents will show?

Believe me, I wish to get this over with as soon as possible but limiting the time both Mast and Popovich have to prepare after reading my deposition is more important and **having the Barch communications before deposing Mast and Popovich is essential**.

If I could wave a magic wand and get the Barch documents and everyone deposed today I would do it in a heart beat.

There is more than just the Barch documents that would be ideal to show the 2-1/2 years of deception, lies and abuse perpetuated by Mast and Popovich on me, their client, but those other documents and communications are not at the core of our case.

The Barch firms communications and documents are at the core of our case and must be obtained.

I'm sorry if I hurt anyone feelings because I don't want to give Mast and Popovich over a month to pour through my deposition before answering questions but this is too important to care about their feelings.

Paul

> On Feb 13, 2020, at 11:52 AM, Ed Clinton <ed@clintonlaw.net> wrote:
>
> Paul,
>
> Just remember that you cannot win a case during your deposition.
>
> Testify from your own personal knowledge.
>
> I highly doubt that you can testify (or that you should testify) about a letter somebody else wrote, which may or may not be genuine.
>
> Stick to what you know - what you saw and what you observed.
>
> Please focus on getting the deposition done and making a demand.
>
> Ed
> Edward X. Clinton, Jr.
> The Clinton Law Firm, LLC
> 111 West Washington Street
> Suite 1437
> Chicago, IL 60602
> (312) 357-1515
> www.clintonlaw.net
> www.chicagolegalmalpracticelawyerblog.com
>
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>
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>
> Finally, this email, by itself, does not create or establish an attorney-client relationship.
>
>> On Feb 13, 2020, at 7:18 AM, Paul Dulberg <Paul_Dulberg@comcast.net> wrote:

Hi Ed,

Is the October 22, 2013 letter an actual communication between Mast and Barch or is it a strategy or trick?

It is essential to verify this from the Barch documents to determine if the letter is a fact or not.

It is also important to limit the time between depositions.

This is my only reluctance.

Paul

> On Feb 12, 2020, at 8:12 PM, Ed Clinton <ed@clintonlaw.net> wrote:
>
> Paul,
>
> Is there a reason you are reluctant to be deposed?
>
> Ed
>
> Edward X. Clinton, Jr.
> The Clinton Law Firm
> 111 West Washington, Suite 1437
> Chicago, Illinois 60602
> (312) 357-1515
> Sent from my iPad
> Clintonlawfirm.blogspot.com
>
> > On Feb 12, 2020, at 6:42 PM, Paul Dulberg <paul_dulberg@comcast.net> wrote:
> >
> > Hi Julia,
> >
> > Perhaps we should file a motion to compel Ronald Barch and Auto-Owners Insurance to turn over all communications and document records with Hans Mast and the Popovich law firm as soon as possible.
> >
> > My thought is if we get those documents now and have a few days to digest them maybe we can keep the deposition dates as they are scheduled.
> >
> > Thanks,
> > Paul
> >
> > > On Feb 12, 2020, at 5:28 PM, Paul Dulberg <Paul_Dulberg@comcast.net> wrote:
> > >
> > > Hi Julia,
> > >
> > > How did we get fixed, forced or locked in on a date to give my deposition before we have finished document discovery of the Barch communications?
> > >
> > > Determining relevance of documents not yet gathered or analyzed on a central issue to our case isn't solely up to the defense to decide.
> > >
> > > It is not fair to us to have to walk into a discovery deposition without seeing the all the documents first whether or not the defense thinks those documents are relevant to my deposition.
> > >
> > > We will determine if the Barch documents are relevant to my deposition or not after seeing what is in them.
> > >
> > > It is also not fair to push Mast and Popovich depositions a month further out on the calendar if the defense is going to try and compel me to testify now. This serves no purpose other than buying the defense more time to formulate responses to what is discovered in my deposition.
> > >
> > > The dates of the depositions should stay as close together as logistically possible if we want the truth and not some formulated fiction of it.
> > >
> > > Let them file the motion to compel. I believe the Judge would agree that we should be able to analyze the Barch records and keep the depositions as close together as possible to get to the truth.
> > >
> > > I believe it is within our rights to see all documents before any depositions begin.

When can we expect to see the Barch communications and documents and how long will we have to analyze them before depositions begin?

Thanks,
Paul

> On Feb 12, 2020, at 1:29 PM, Julia WIlliams <juliawilliams@clintonlaw.net> wrote:
>
> 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
> <phone_3aef1e25-ed01-4e86-9c05-55877d93199b.jpg> P: (312) 431-3622
> <fax_b47779bc-2f12-4a09-9ce3-87f4947c34ef.png> F: (312) 431-3670
> <envelope_5540fafc-2f13-4c5f-af64-a2c20113037b.png> 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