

From: Julia Williams juliawilliams@clintonlaw.net
Subject: Re: PAUL DULBERG v. THE LAW OFFICES OF THOMAS J. POPOVICH, P.C, et al. (Circuit Court of McHenry County, IL No. No. 17 LA 377)
Date: August 3, 2020 at 12:58 PM
To: Paul Dulberg Paul_Dulberg@comcast.net
Cc: Mary Winch marywinch@clintonlaw.net, Ed Clinton ed@clintonlaw.net

JW

Dear Paul,

I did a word search for "Gooch" in all the document files that our firm produced in the case. I do not see that any communications between you and Gooch were produced to Opposing Counsel.

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 Jul 30, 2020, at 4:21 PM, Julia Williams <juliawilliams@clintonlaw.net> wrote:

Dear Paul,

I apologize; I was obviously incorrect in my statement that you did not send me communication between you and Gooch. The communications were not included in Gooch's file. I do not believe any communication between you and Gooch were produced. However, I need to double check.

If they were not produced, you will need to address that issue in the responses—either objection to production or producing.

Best Regards,

Julia Williams
Of Counsel
The Clinton Law Firm
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On Jul 30, 2020, at 3:13 PM, Paul Dulberg <Paul_Dulberg@comcast.net> wrote:

Hi Julia,

I just did a QUICK search on my iPad sent mail and on 11/172018 I sent you an email the Subject read "Start of Gooch communications".

These were the emails between myself and Gooch

I believe it was several emails that were sent to you with gooch's emails

Again, I will double check tonight and tomorrow to be sure

I'm driving home now

Thanks,
Paul

On Jul 30, 2020, at 2:26 PM, Julia Williams <juliawilliams@clintonlaw.net> wrote:

Dear Paul,

Attorney-Client Privilege:

We waived attorney-client privilege as to the underlying case, meaning the original case that you filed against the McGuires and Gagnon. I did not waive any attorney client privilege as to the current case against Thomas Popovich firm and Mast—17 LA 377—which would be between you and Attorney Gooch/his firm or you and our firm. I maintained an objection in the deposition as to any communications between you and Attorney Gooch.

I did provide Attorney Gooch's retainer contract in the last set of documents as I do not believe that is actually privileged. It is not intended to provide advice or confer confidential information.

Communication with Gooch:

I did not receive from you or Attorney Gooch any emails or communication between you and Mr. Gooch. I received Attorney Gooch's file, but his file did not include any communication between him and you.

I did receive from you and Attorney Gooch emails and communications between you and your counsel in the underlying case, which was produced with the documents.

You are only required to produce documents in your possession or control, so if you didn't take notes on a conversation then there would be no documents.

You have received all of the discovery that we produced on your behalf to the other side.

Best Regards,

Julia Williams
Of Counsel
The Clinton Law Firm
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juliawilliams@clintonlaw.net

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On Jul 30, 2020, at 1:50 PM, Paul Dulberg <pdulberg@comcast.net> wrote:

Hi Julia,

Thank you for getting this extended.

I'm pulling from memory here because I had a Dr's appointment today and am away from my desk

I just took your July 2 email and reviewed it.

I didn't collect the documents because I thought I had already turned over all the gooch files and emails to you and I thought we waived privilege for Boudin and you have all of that as well.

I suppose other than the last request asking for "documents" relating to a conversation between Baudin and myself when we were leaving the ADR the rest of this would be contingent on Judge Meyers decision of the objections over Gooch questioning that were raised during my deposition.

I'm still not sure how I'm supposed to have documents from a verbal conversation with Baudin.

I will look at all this again when I get home.

Thanks again,
Paul

On Jul 30, 2020, at 10:21 AM, Julia Williams <juliawilliams@clintonlaw.net> wrote:

Dear Paul,

These document requests are due today. We have obtained a 28 day extension so the responses are now due August 27, 2020. We anticipate filing our motion to withdraw. Thus, you will need your new counsel to respond or prepare your own response.

Best Regards,

Julia Williams
Of Counsel
The Clinton Law Firm
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On Jul 2, 2020, at 12:10 PM, Julia Williams <juliawilliams@clintonlaw.net> wrote:

Dear Paul,

Opposing Counsel has tendered a supplemental request for production. Please review. A response is due by July 30, 2020.

You can begin gathering responsive documents.

Some of the document may be subject to attorney-client privilege.

Best Regards,

Julia Williams
Of Counsel
The Clinton Law Firm
111 W. Washington, Ste. 1437
Chicago, IL 60602
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Begin forwarded message:

From: Linda Walters <lwalters@KARBALLAW.com>
Subject: PAUL DULBERG v. THE LAW OFFICES OF THOMAS J. POPOVICH, P.C, et al. (Circuit Court of McHenry County, IL No. No. 17 LA 377)
Date: July 2, 2020 at 11:11:39 AM CDT
To: "ed@clintonlaw.net" <ed@clintonlaw.net>, "juliawilliams@clintonlaw.net" <juliawilliams@clintonlaw.net>, "Marywinch@clintonlaw.net" <Marywinch@clintonlaw.net>
Cc: George Flynn <gflynn@karballaw.com>

On behalf of George Flynn, please see the attached:

- Supplemental Request for Production to Plaintiff; and
- Notice of Service of Discovery Document – Supp. RFP to Plaintiff

Thank you.

Linda Walters

Karbal | Cohen | Economou | Silk | Dunne | LLC
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<image_1a0000>

<phone_3aef1e25-ed01-4e86-9c05-55877d93199b.jpg>

P: (312) 431-3641

<fax_b47779bc-2f12-4a09-9ce3-87f4947c34ef.png>

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E: lwalters@KARBALLAW.com

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<2691756v1 - Supplemental Request for Prod. to Plaintiff.PDF>

<2691837v1 - Notice of Service of Discovery Documents -- Supplemental RTP to Plaintiff (FS).PDF>