

From: Paul Dulberg Paul_Dulberg@comcast.net
Subject: Re: PLEASE HELP WITH CASE FILE
Date: October 16, 2020 at 10:38 AM
To: The Clinton Law Firm juliawilliams@clintonlaw.net
Cc: Ed Clinton ed@clintonlaw.net, Mary Winch marywinch@clintonlaw.net

PD

Hi Julia,

Thank you

It looks like everything in the "Dulberg Documents to Be Produced 2020 June 25" is in the "Dulberg Docs Produced by Dulberg to OC" with the exception of "Dulberg JCW Notes re Discovery 2020 June 26.docx", which is your notes, and the "Dulberg Paul's Notes on Deposition and handwritten notes 2020 July 1" which is nothing more than a color duplicate of the black and white PDFs produced in the "Dulberg 7893-8551 .pdf"

Is it safe for me to assume that opposing counsel has been given all documents with the exception of the privileged gooch emails?

Also, I see in the "Dulberg JCW Notes re Discovery 2020 June 26.docx" that you were worried about the waiver issue for Gooch. I don't agree, I answered those questions in the deposition under an objection and certainly didn't waive privilege.

It appears the defense counsel is confused over when I should have known of an injury vs when I learned from an attorney that I had a case in an attempt to pry into privileged communications that cannot change the outcome for their stated goal of reopening the statute of limitations and deposing Gooch and myself for a second time.

It seems to me to be simple math when calculating the statute of limitations

1. The malpractice happened between October 2013 and February 2014 in the underlying case
2. The earliest I could or should have known of the injury was December 12th, 2016 from the award in the underlying case
3. This case was filed on November 28, 2017
4. There is no conversation that could take place between myself and Gooch that could change the first two dates even in the slightest and the third date, the date we filed suit was the culmination of our work product in the current case, not the underlying case.

One more question,
Where do I find all the final answers we sent to opposing counsel for the interrogatories and supplemental interrogatories?

Thank you again,
Paul

On Oct 16, 2020, at 8:40 AM, Julia Williams <juliawilliams@clintonlaw.net> wrote:

Everything that was produced is in the file Dulberg Discovery Produced by Dulberg to OC. All the files in the 2020 June folder should have been produced over the summer.

Best regards,

Julia Williams
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On Oct 15, 2020, at 11:23 PM, Paul Dulberg <Paul_Dulberg@comcast.net> wrote:

Hi Julia,

Have all the items in a folder named "Dulberg Documents to Be Produced 2020 June 25" been sent to opposing counsel already?

Thanks
Paul

On Oct 15, 2020, at 4:01 PM, Paul Dulberg <Paul_Dulberg@comcast.net> wrote:

Hi Julia,

I know your off this case but I am overwhelmed and could use your help.

I need all of the final discovery documents we sent to opposing counsel through the case.

This includes all our final answers to interrogatories and document production sent as well as all supplementals requests etc....

Why?

I messed up a few weeks ago when you sent the thumb drive. It filled my hard drive and I couldn't get it all in the Mac and I had a computer crash. My machine froze up and I had to move or delete a lot of data. I tried to then to use my old 32 bit windows PC and move the files to windows and that created more issues than I can count. I have spent weeks trying to sort things out. Bottom line, I think I'm suffering from information overload and moved so many things around to make room that I can't find anything anymore or if I do find it I'm not sure that it is the final version of what I am looking for.

I will never know your file system as well as you.

Please help me out with this

You can resend me the emails with the final discovery documents and interrogatories

Or

Send new emails with all the final discovery documents

Or

Send me the exact file names so I can do a search and find them.

I know I am asking a lot of you to help even though you withdrew and I am sorry I wasn't better prepared for that much data to come my way.

Thank you and stay safe,
Paul