

**From:** Ed Clinton ed@clintonlaw.net  
**Subject:** RE: To: Jared Stromer From: JCW  
**Date:** October 17, 2020 at 10:01 AM  
**To:** Paul Dulberg Paul\_Dulberg@comcast.net, Julia Williams juliawilliams@clintonlaw.net

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EC

Paul,

You can argue for whatever damages you want. You may be stuck with the prior arbitration award as a limit depending on what the judge decides. This is not an easy question.

The problem with your case is that (a) going forward is costly because you need an expert witness to prove malpractice; and (b) the other side has no interest in settlement.

I would ask the judge for a settlement conference.

Ed

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**From:** [Paul Dulberg](#)  
**Sent:** Saturday, October 17, 2020 8:59 AM  
**To:** [Julia Williams](#); [Ed Clinton](#)  
**Subject:** To: Jared Stromer From: JCW

Hi Julia,  
Below are two questions I found in a memorandum.  
Where may I find the response?

Thank you

Is Client collaterally estopped from arguing higher damages? (Basically, is he stuck with the award that was given at binding mediation?)

What is the Homeowners liability?

Memorandum  
To: Jared Stromer From: JCW  
RE: Collateral Estoppel and Agency Theory

