

From: Paul Dulberg Paul_Dulberg@comcast.net
Subject: Re: One more
Date: October 17, 2020 at 7:53 PM
To: The Clinton Law Firm juliawilliams@clintonlaw.net, Ed Clinton ed@clintonlaw.net
Cc: Mary Winch marywinch@clintonlaw.net

PD

I sent that prematurely

Add the homeowners could have brought in a Crain or other large piece of machinery used for removing large trees, again controlling the means and methods

either choice they made the only choice that would have made Gagnon an independent contractor would have been to leave the choice to Gagnon to choose the method by his choice of the tools.

The McGuires clearly controlled the means and method they wanted when they had Gagnon had to perform the work with the tools the homeowners selected

On Oct 17, 2020, at 7:38 PM, Paul Dulberg <Paul_Dulberg@comcast.net> wrote:

Just have to get this in after reading some of that research you sent me earlier

The homeowners controlled the means and method by which the work that was to be done when they chose the chainsaw as the tool to do the work.

They could have chosen an axe which drastically changes the means and method

Or

They could have chosen to let their son choose the means and method by letting him bring his own tools, now that choice would make him an independent contractor

I think you needed to give the paralegal more information and his results wouldn't be so obviously wrong