

**Date : 1/20/2021 4:07:14 AM**  
**From : "Paul Dulberg"**  
**To : "Law Office Of Alphonse Talarico"**  
**BCc : "Paul Dulberg"**  
**Subject : Re: Timeline of McGuire settlement - Mast/Popovich intentional legal malpractice**

Attachment available until Feb 19, 2021

Dear Mr Talarico,

Please find the attached file named Dulberg Cicero France Barch Production Complete.zip

I sent this as a compressed file due to size. If you have any troubles with opening this file, I can send each file individually.

This is what the Clinton firm received from the attorney whom represented the McGuires after a subpoena.

Something to note within these files:

1. Mast initiated the settlement offer on October 22, 2013
2. There is nothing to suggest the McGuires attorney was filing or even thinking of filing a motion for summary judgement to get out of the case.

From these files it looks like the only source of the McGuires getting out of the case on a motion for free was conceived at the Popovich firm and used to create the artificial pressure of a time constraint on their client Dulberg so he would agree to settle fast.

Thank you,  
Paul

[Click to Download](#)

Dulberg Cicero France Barch Production Complete.zip  
29 MB

On Jan 20, 2021, at 3:48 AM, Paul Dulberg <[Paul\\_Dulberg@comcast.net](mailto:Paul_Dulberg@comcast.net)> wrote:

Dear Mr Talarico,

Please find the attached file named 2021-01-20\_McGuire settlement timeline For Alphonse-Bates numbers corrected.txt

This file replaces the previous file named 2021-01-16\_McGuire settlement timeline For Alphonse.txt

I believe you will find the new file much easier to follow with the correct bates numbers.

I tried to include bates numbers for every copy within both the defense and plaintiff document disclosures which means several copies of the same thing.

I also tried to add the bates numbers for the entire email chain associated with the target quote so that things are kept in context.

In the following email I will attempt to send the folder of documents that were subpoenaed by the Clinton firm from the McGuire's attorney Barch.

Thank You,  
Paul

<2021-01-20\_McGuire settlement timeline For Alphonse-Bates numbers corrected.txt>

On Jan 19, 2021, at 11:58 AM, Paul Dulberg  
<[Paul\\_Dulberg@comcast.net](mailto:Paul_Dulberg@comcast.net)> wrote:

Dear Mr Talarico,

I wanted to let you know I found the mistakes I made in the bates numbering of the McGuire settlement timeline file and am approximately 50 percent done fixing the bates numbers.

I should have the corrected copy available for you by tomorrow morning.

Thank you,  
Paul

On Jan 16, 2021, at 12:22 PM, Paul Dulberg  
<[Paul\\_Dulberg@comcast.net](mailto:Paul_Dulberg@comcast.net)> wrote:

It helps if I remember to attach the file. Here it is.  
<2021-01-16\_McGuire settlement timeline For Alphonse.txt>

Begin forwarded message:

**From:** Paul Dulberg

<[Paul\\_Dulberg@comcast.net](mailto:Paul_Dulberg@comcast.net)>

**Subject: Timeline of McGuire settlement - Mast/Popovich intentional legal malpractice**

**Date:** January 16, 2021 at 12:21:14 PM CST

**To:** Alphonse Talarico

<[contact@lawofficeofalphonsetalarico.com](mailto:contact@lawofficeofalphonsetalarico.com)>

Dear Mr Talerico,

Please find the attached file named 2021-01-16\_McGuire settlement timeline For Alphonse.txt.

This is a timeline of events from October 2013 through April of 2014 with document numbers for reference.

This is the first of a series of files I am compiling per our phone discussion on Friday.

At this point I am not sure how many files I will be sending but I will try to be as thorough as I can be.

Thanks,  
Paul