

**Date : 7/6/2021 9:04:49 AM**  
**From : "Paul Dulberg"**  
**To : "Alphonse Talarico"**  
**BCc : "Paul Dulberg"**  
**Subject : 17LA377**

Dear Mr Talarico,

I am still working on the issues I wish to use in the amended complaint and in the Admission of facts.

I keep finding new things and its taking a long time to link all the parts together.

One example is 2 separate and distinct invoices from urbanski 9 months apart for the same Gagnon deposition in 2013  
Thats a \$700+ unneeded expense

Another is the cost of ordering my deposition by mistake when I asked to read Gagnon's deposition in December of 2012) (Haven't found the invoice on this one yet bit it's got to be close to another \$700.)

Another, Holding my case file hostage after the Popovich withdrawal in March of 2015 for expenses when expenses were not to be paid until settlement of the case, according to the contract for legal services both Popovich and I signed.

Once subsequent counsel Balke pays \$1500+ for the Ransom of the case file we get a jumbled up mess missing huge chunks of the depositions and who knows what else that I refer to as the "Brown Box File" that was anything but a complete case file.

After the Messed up Brown Box File I had to keep at Popovich for months finally getting what I call the "Brown Jacket File" in August of 2015 which I thought was complete until I received a 3rd version of the case file In July of 2019 Showing the Rx Timestamps and October 22 2013 offer to McGuires, etc...

Wait, because the case file is still not complete in July of 2019. Its still missing the audio recording of the 2012 phone conversation between Mast and Gagnon used as Gagnon exhibit 2 that I requested before the Original Brown box file was turned over.

Then there is the simple stuff like ordering 25 color copies at minuteman press when the McGuire's attorney asked for 12 copies and said it was okay to email them rather than print hard copies.

This list goes on and on.

We need to talk about how much time I have to get you this stuff because it takes me a long time to correctly link and find the correct Bates stamped documents to everything.

I have been at this every day since we last talked and it is slow arduous work.

Please give me a call and lets rethink timeframes for completing this task.

Thanks,  
Paul