

Date : 8/16/2021 6:01:35 AM

From : "Paul Dulberg"

To : "Law Office Of Alphonse Talarico"

BCc : "Paul Dulberg"

Subject : Re: Response to request to Admit

Attachment : 2021-08-16_Plaintiff Response to Defendants request for admissions of fact and genuineness of document.pdf; ATT00002.bin;

Dear Mr. Talarico,

Please find the attached file named 2021-08-16_Plaintiff Response to Defendants request for admissions of fact and genuineness of document.pdf

It is signed.

2021-08-16_Plaintiff Response to Defendants request for admissions of fact and genuineness of document.pdf has been processed through Adobe OCR (Optical Character Recognition) so that it meets the requirement that all PDF's be searchable.

Per our discussion I will mail the signed paper version to your office today.

I want to take note here that the December 26th 2014 date listed in the Saul Ferris document is suspect but as we discussed, I cannot pin down the date that I met with Saul Ferris as I have no independent recollection of the date. I believe the meeting was between February 23, 2015 and March 6, 2015 based on refreshing my memory from emails and when I believe I first learned of his name but am not 100 percent certain, as we discussed, I contacted a lot of attorney's during the time Mast/Popovich were suggesting that I find new counsel some of them more than once because I did not keep a list of those I had previously contacted and forgot that I had already contacted some earlier and contacted them again. It is possible that I contacted Saul Ferris earlier than February 23rd but unlikely as most attorneys I contacted a second time by accident usually said you already spoke with us and I do not recollect Saul Ferris commenting that I had spoken to him earlier.

I don't think it matters but I wanted a note that I am not 100% certain because I know I did make the mistake of contacting several firms more than once by accident over the, I think it was thirteen months, time span since Mast/Popovich first told me to find new counsel and they finally withdrew from the case. I believe it was February of 2014 - March of 2015 time span that Mast/Popovich first suggested finding new counsel and them withdrawing from the case.

Thank you for all the work you did on this to date,
Paul