

Date : 8/27/2021 2:41:26 PM
From : "Alphonse Talarico"
To : "Paul Dulberg"
Subject : Re: Lets talk about what's next
Attachment : Defendant_s Motion to Deem Facts Admitted.PDF;

Dear Mr. Dulberg,

Pursuant to our discussion of today's date please find attached Defendant's Motion to have their Requests To Admit deemed admitted which will be up for the first time on September 7, 2021.

Sincerely,

Alphonse A. Talarico

From: Paul Dulberg <Paul_Dulberg@comcast.net>

Sent: Friday, August 27, 2021 1:35 PM

To: Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>

Subject: Lets talk about what's next

Dear Mr Talarico,

When you have time soon, Lets talk on the phone about what's next.

I know we are going to need more than 1 discussion about what's next because I need time to do an in depth search for what is needed.

I believe the next court date is 9/17/2021

This is a quick list, it is not complete by any means, Off the top of my head that I think needs to be done by us:

1. Motion to Compel defendants produce documents, etc. for:
 - a. Actual recording of Gagnon's recorded phone statements Mast used as an exhibit in the Gagnon deposition.
 - b. Mast and Popovich actual insurance policies
 - c. Gagnon's answers to Dulberg's Interrogatories
 - d. Gagnon's answer to production request
 - e. Dulberg trust account number(s), financial institution and statements.
 - f. Picture of the back of the McGuire settlement check
 - g. More to come as I remember it and we discuss what we are missing from the defense and they should have already provided to us.
2. Accept deny documents as fact - I would like to see what documents you have for them to accept or deny as fact and possibly add more after we discuss it
 - a. If we are limited I would like to keep them centered around the 3 pillars; 222(b) affidavit, altered timestamps on RX receipts with leading and planting a false narrative in the depositions, the October 22, 2013 \$7,500 offer mast made to the McGuires
3. Update our interrogatory answers
 - a. Add the discovery of the 222(b) affidavit limiting any recovery to only \$50,000
 - b. Add the discovery of the altered timestamps found on the RX receipts

c. More to come after we discuss

4. Update the complaint with the new discoveries possibly adding new counts.

Also, I'm still building the timeline and noticed that Mast filed an attorney lien with Gagnon/Accardo/Allstate;

Post Bankruptcy

Post withdrawal

Post new counsel Balke making a trade, Dulberg case for Cavanaugh case

Post Mast releasing his lien to Balke

and I don't know what to make of it or why he would send the attorney lien long after withdrawing, not to the bankruptcy trustee but to opposing counsel.

Speculation: Was Mast hoping that Allstate would send him the check by mistake so he could continue to steel and make this as difficult as he could long after he was gone, part of a plan to make sure I didn't have money to go after him later?

Anyway, lets talk on the phone soon,

Paul