

**Date : 11/22/2021 2:00:44 PM**

**From : "Paul Dulberg"**

**To : "Law Office Of Alphonse Talarico"**

**BCc : "Paul Dulberg"**

**Subject : Re: 201(K) telephone contact Tuesday in Dulberg v. Popovich**

Dear Mr Talarico,

I am going to share some raw thoughts and questions on this:

1. Is Mr Flynn saying that Julia Williams has broken privilege by speaking with Mr Flynn about this ongoing case?
2. Is Mr Flynn willing to sign an affidavit as to the truthfulness in his correspondence with you and be deposed to get to the facts?

I get the feeling there is more to all of this since Julia Williams has not replied to our request but Mr Flynn is claiming she replied to his requests.

Bottom line since we are short on time due to Mr Flynn leaving town last week and the holiday this week;

Yes. Write the motion to compel.

We can adjust it as necessary if and when Julia Williams decides to grace us with a response.

I consider it money well spent.

Thank you,  
Paul

On Nov 22, 2021, at 12:55 PM, Alphonse Talarico  
<[contact@lawofficeofalphonsetalarico.com](mailto:contact@lawofficeofalphonsetalarico.com)> wrote:

□

**From:** George Flynn <[gflynn@karballaw.com](mailto:gflynn@karballaw.com)>

**Sent:** Monday, November 22, 2021 9:22 AM

**To:** Alphonse Talarico <[contact@lawofficeofalphonsetalarico.com](mailto:contact@lawofficeofalphonsetalarico.com)>

**Subject:** RE: 201(K) telephone contact Tuesday in Dulberg v. Popovich

Mr. Talarico:

I am available at 10:00 a.m. on Tuesday.

Since you first advised of the issues you raised last week, I spoke with Julia Williams, and have obtained copies of several hearing transcripts addressing written discovery. In short, Julia and I had an agreement that she would issue discovery to be answered. We agreed that Defendants would not answer the discovery propounded by Gooch. When Popovich and Mast answered discovery, she informed the court that it had been answered. We then moved on and she deposed Mr. Mast.

Ms. Williams had no issues or objections to Mast's and Popovich's responses, besides some questions she had with the document production. We then made arrangements for her to view the physical file at Popovich's office. I met her there, she reviewed the file and her inquiry was satisfied. Defendants relied on Williams' agreement and representations to the court that written discovery had been answered.

With respect to the manner in which Popovich and Mast responded to Williams' document requests, Williams had no objection, given the general nature of the requests. And again, she wrote to me with some issues that she did have, and we resolved the issues. She agreed with my assessment when we spoke last week.

With this background, I do not see what issues need to be resolved at this late date. I plan to ask the court to close f(1) discovery.

In any event, please call my cell phone number at 10:00 a.m. Tuesday. 773-341-8114.

Thank you

**George Flynn**

**Karbal | Cohen | Economou | Silk | Dunne | LLC**

150 S. Wacker Drive

Suite 1700

Chicago, IL 60606

<phone\_3aef1e25-ed01-4e86-9c05-55877d93199b.jpg> P: (312) 431-3622

<fax\_b47779bc-2f12-4a09-9ce3-87f4947c34ef.png> F: (312) 431-3670

<envelope\_5540fafc-2f13-4c5f-af64-a2c20113037b.png> E: [gflynn@karballaw.com](mailto:gflynn@karballaw.com)

**CONFIDENTIALITY NOTE:**

This electronic message transmission contains information from the law firm of Karbal, Cohen, Economou, Silk & Dunne, LLC. which may be confidential or privileged. The information is intended to be for the use of the individual or entity named above. If you are not the intended recipient, please immediately delete this e-mail and be aware that any disclosure, copying, distribution or use of the contents of this information is prohibited.

**From:** Alphonse Talarico <[contact@lawofficeofalphonsetalarico.com](mailto:contact@lawofficeofalphonsetalarico.com)>

**Sent:** Sunday, November 21, 2021 12:50 PM

**To:** George Flynn <[gflynn@karballaw.com](mailto:gflynn@karballaw.com)>

**Subject:** Re: 201(K) telephone contact Tuesday in Dulberg v. Popovich

Dear Mr. Flynn,

Does Tuesday November 23, 2021 at 10:00 am work for you ?

If so, I will make the call so that we can try to find a mutually agreeable solution regarding discovery issues.

This email and our follow up telephone conversation(s) are pursuant to Supreme Court Rule 201(K).

Your anticipated cooperation is greatly appreciated,  
Alphonse A. Talarico

---

**From:** George Flynn <[gflynn@karballaw.com](mailto:gflynn@karballaw.com)>  
**Sent:** Wednesday, November 17, 2021 7:37 PM  
**To:** Alphonse Talarico <[contact@lawofficeofalphonsetalarico.com](mailto:contact@lawofficeofalphonsetalarico.com)>  
**Cc:** Linda Walters <[lwalters@karballaw.com](mailto:lwalters@karballaw.com)>  
**Subject:** Re: 201(K) telephone contact tomorrow Dulberg v. Popovich

Mr. Talarico.

If you would still like to talk, please let me know a date and time next week that will work. I will be out of town the remainder of this week.

Thanks

**George Flynn**

**Karbal | Cohen | Economou | Silk | Dunne | LLC**

150 S. Wacker Drive

Suite 1700

Chicago, IL 60606

<image001.jpg> P: (312) 431-3622

<image002.png> F: (312) 431-3670

<image003.png> E: [gflynn@karballaw.com](mailto:gflynn@karballaw.com)

**CONFIDENTIALITY NOTE:**

This electronic message transmission contains information from the law firm of Karbal, Cohen, Economou, Silk & Dunne, LLC. which may be confidential or privileged. The information is intended to be for the use of the individual or entity named above. If you are not the intended recipient, please immediately delete this e-mail and be aware that any disclosure, copying, distribution or use of the contents of this information is prohibited.

On Nov 15, 2021, at 10:02 AM, Alphonse Talarico  
<[contact@lawofficeofalphonsetalarico.com](mailto:contact@lawofficeofalphonsetalarico.com)> wrote:

Dear Mr Flynn,

Tomorrow will not work for me.

I am sure that additional communication is warranted but I will contact you to find a mutually agreeable date and time.

YOUR ANTICIPATED COOPERATION IS GREATLY APPRECIATED,  
Alphonse A Talarico