

Date : 11/28/2021 1:33:11 PM

From : "Paul Dulberg"

To : "Law Office Of Alphonse Talarico"

BCc : "Paul Dulberg"

Subject : Re: Dulberg v Mast et al. Discovery Requests

Attachment : Dulberg v Popovich et al Documents.pdf; ATT00002.bin; Dulberg v Popovich-4.pdf; ATT00004.bin; Dulberg -3.pdf; ATT00006.bin;

Dear Mr Talarico,

Below is a work in progress timeline of sorts of the documents I sent yesterday and a few more attached to this email today. I am building it as I come across any emails that discuss any part of the discovery with Flynn.

I am still searching for the emails from Clinton to Flynn around March 22, 2019 when Julia Williams emailed me and stated "Attached please find the discovery requests we sent to opposing counsel today", as you can see from the timeline that follows, I haven't found any yet.

I will keep at it and hopefully find what we are looking for.

Also, I counted the blacked out pages Julia Williams lists for Flynn.

106 is the count.

I also counted this years ago but have not confirmed this number with my own count.

Thanks,

Paul

2019-04-08

NOTICE OF FILING

Plaintiff's Answer to Defendants' Affirmative Defenses (Not File Stamped)

Dulberg NOF Aff Defenses 2019 April 8.pdf

2019-11-04

NOTICE OF FILING & FOURTH AFFIRMATIVE DEFENSE (Judgmental Immunity/Lawyer's Judgement Rule) (File Stamped)

THE LAW OFFICES OF THOMAS J. POPOVICH, P.C. AND HANS MAST'S AMENDED AFFIRMATIVE DEFENSES

Flynn to Clinton

Dulberg Def. Amended Affirmative Defenses FILED 2019 Nov 4.pdf

2019-12-17

Email - Resending the all discovery

Clinton to Flynn

Dulberg case.pdf

Page 3

2019-12-17 thru 2020-01-31

Email - Dulberg Discovery Responses & 106 Bates Stamped Blacked Out in Popovich Firm Document Production (This is one long email chain)

Clinton to Flynn

Dulberg v Popovich et al.pdf

2020-01-31

Email - set to appear at Popovich's office on Monday after court

Flynn to Clinton

Dulberg.pdf

2020-03-06

Email - pursuant to 201(k)

Flynn to Clinton

Dulberg v Popovich-2.pdf

2020-06-04

Email - Notice of Deposition

Clinton to Flynn

Dilberg.pdf

Page 3

2020-06-25 -

Email - Request for production of communications with Mr. Gooch

Flynn to Clinton

Dulberg -3.pdf

Page 1

2020-07-02 thru 2020-07-30

Email - Supplemental Request for Production to Plaintiff and Notice of Service of Discovery

Document - Time extension (This is a long email chain)

Fwd PAUL DULBERG v THE LAW OFFICES OF THOMAS J POPOVICH PC et al Circuit Court of McHenry County IL No No 17 LA 377.pdf

Pages 1-10 and 31-33 are between Clinton and Flynn.

Pages 11-30 and 34-48 are between Clinton and Dulberg

2020-07-09

Email - more documents
Clinton to Flynn
Dulberg v Popovich-4.pdf

2020-07-09

Email - Here is the final file. (End of bates stamped documents)
Clinton to Flynn
Dulberg v Popovich et al Documents-2.pdf
Page 1, 5

2020-07-09

Email - Attached are more documents
Clinton to Flynn
Dulberg v Popovich et al Documents.pdf
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