

Date : 12/1/2021 2:50:42 PM

From : "Paul Dulberg"

To : "Alphonse Talarico"

BCc : "Paul Dulberg"

Subject : Gagnon exhibit 2 Recorded phone statement and emails about case file

Dear Mr Talarico,

Per our phone conversation earlier today I have been compiling the topics sought below.

It is still a work in progress as I yet have to add emails from before Mast withdrew. I should finish this by tomorrow morning.

On a side note, Please send me a PDF copy of motion you filed today along with the notice of filing.

Thank You,
Paul

From Gagnon deposition

(Dulberg 000724 through Dulberg 000727)

(Dulberg 003637 through Dulberg 003640)

* (Note: I did not search the rest of the deposition for any other mention of the recorded phone statement and I only included the Dulberg bates stamped depositions of Gagnon)

Gagnon Exhibit 2

(Dulberg 000760 & Dulberg 000761)

(Dulberg 003673 & Dulberg 003674)

* (Note: I am still working on discussions/emails about the case file from before the Mast withdrawal. Hope to have this completed by tomorrow morning.)

* (Note: Below are Emails about Digital/Electronic case file and obtaining the actual recording of Gagnon Exhibit 2 after Mast departs from case.

I tried to pull every place these emails are mentioned in the Dulberg bates stamped documents but would need a lot more time to confirm all bates numbers are listed.)

On Mar 13, 2015, at 10:51 AM, Paul Dulberg <pdulberg@comcast.net> wrote:

Hans,

Your motion was granted.

Please put together all the materials you have concerning this case and notify me when they can be picked up. Please include everything, emails, notes, depositions, motions, recordings, etc...

Paul

Paul Dulberg 847-497-4250 Sent from my iPad

(Dulberg 001336)

(Dulberg 001337 & Dulberg 001338)

(Dulberg 001339)

(Dulberg 001340)

(Dulberg 002791)

(Dulberg 002792 & Dulberg 002793)

(Dulberg 002794)
(Dulberg 002795)
(Dulberg 004966)
(Dulberg 004967 & Dulberg 004968)
(Dulberg 004969)
(Dulberg 004971)
(Dulberg 006833)
(Dulberg 006834 & Dulberg 006835)
(Dulberg 006836)
(Dulberg 006838)
(Dulberg 007226)
(Dulberg 007227 & Dulberg 007228)
(Dulberg 007229)
(Dulberg 007231)

On Mar 13, 2015, at 11:01 AM, Hans Mast <hansmast@att.net> wrote:

Paul. I am seriously willing to work with you to get new counsel. But you have to understand that until our costs are paid we can't let the file out of our office because we invested all the time and money into the file. Your new attorney will surely know this....

(Dulberg 001336)
(Dulberg 001337)
(Dulberg 001339)
(Dulberg 002791)
(Dulberg 002792)
(Dulberg 002794)
(Dulberg 004966)
(Dulberg 004967)
(Dulberg 004969)
(Dulberg 006833)
(Dulberg 006834)
(Dulberg 006836)
(Dulberg 007226)
(Dulberg 007227)
(Dulberg 007229)

On Mar 13, 2015, at 11:21 AM, Paul Dulberg <pdulberg@comcast.net> wrote: Hans/Sir,

I don't want my new attorney to even speak with you. And yes I have that right.

You have your lean against this case and you removed yourself against my wishes. That lean is as good as it gets. Your guaranteed your share.

Please Have those files ready and notify me when I may pick them up as I am limited on the time to hire a new attorney.

Paul Dulberg 847-497-4250 Sent from my iPad

(Dulberg 001335 and Dulberg 001336)
(Dulberg 001337)
(Dulberg 001339)
(Dulberg 002790 & Dulberg 002791)
(Dulberg 002792)
(Dulberg 002794)
(Dulberg 004965 & Dulberg 004966)
(Dulberg 004967)
(Dulberg 004969)
(Dulberg 006832 & Dulberg 006833)
(Dulberg 006834)
(Dulberg 006836)
(Dulberg 007225 & Dulberg 007226)
(Dulberg 007227)

(Dulberg 007229)

On Mar 13, 2015, at 11:25 AM, Hans Mast <hansmast@att.net> wrote:

Paul, I'm happy to deal with your new attorney on our fee but we can't release the file until we get our costs paid back. Sent from my iPhone

(Dulberg 001335)

(Dulberg 001337)

(Dulberg 002790)

(Dulberg 002792)

(Dulberg 004965)

(Dulberg 004967)

(Dulberg 006832)

(Dulberg 006834)

(Dulberg 007225)

(Dulberg 007227)

On Mar 13, 2015, at 11:49 AM, Paul Dulberg <pdulberg@comcast.net> wrote: Sir,

Your fees are guaranteed. You have your lean.

Please don't make me go before the judge and have the records subpoenaed.

Paul Dulberg 847-497-4250 Sent from my iPad

(Dulberg 001335)

(Dulberg 001337)

(Dulberg 002790)

(Dulberg 002792)

(Dulberg 004965)

(Dulberg 004967)

(Dulberg 006832)

(Dulberg 006834)

(Dulberg 007225)

(Dulberg 007227)

From: Paul Dulberg <pdulberg@comcast.net> Date: March 13, 2015 at 12:14:41 PM CDT To: Hans Mast <hansmast@att.net>

Subject: Re: Certified mail

Hans,

May I remind you, Less than 2 weeks ago you said in an email you had all the records ready for my new attorney. I can provide a copy of that email if you can't even remember two weeks ago or can't figure out how to go back that far in your email account.

Now that you removed yourself, you claim that you cannot turn over the records until your paid.

The lean is your only guarantee. It's the same guarantee all the medical professionals have against this case.

If you are unwilling then This has all the makings of what society calls a shyster lawyer.

Please Turn over all records pertaining to this case from start to finish for you may not speak with my new council. I most likely already have to pay double attorney fees for this case thanks to you.

Please don't cost me any more money or I may just let this case expire and you get nothing.

Is that what you want?

Paul Dulberg 847-497-4250 Sent from my iPad

(Dulberg 001335)

(Dulberg 002790)

(Dulberg 004965)

(Dulberg 006832)

(Dulberg 007225)

From: Paul Dulberg <pdulberg@comcast.net> Date: July 20, 2015 at 8:07:04 AM CDT

To: Hans Mast <hansmast@att.net>

Subject: Case files

Hi Hans,

Sorry I need to bother you again.

I need your electronic case file for Paul Dulberg along with all paper files you have.

I did get the paper files from Brad Balke however of the plaintiffs/defendants depositions I received sections are missing in each and there are no dr's depositions at all. Brad promises he turned over everything he received from you.

Please collect all relevant information you have for this and notify me when it will be available to be picked up.

Thank you in advance for your help with this matter,

Paul

Paul Dulberg 847-497-4250 Sent from my iPad

(Dulberg 001321)

(Dulberg 002885)

(Dulberg 004897)

(Dulberg 006764)

(Dulberg 007157)

On Aug 17, 2015, at 1:51 PM, Paul Dulberg <pdulberg@comcast.net> wrote: Hi Hans,

Thank you for another paper copy of my case file. Does this exist in digital form?

Also, I will need the original audio recordings of the telephone conversations between yourself and David Gagnon you listed as Gagnon exhibit 2.

Thanks in advance, Paul

Paul Dulberg 847-497-4250 Sent from my iPad

(Dulberg 001316)

(Dulberg 001317)

(Dulberg 001318)

(Dulberg 002893)

(Dulberg 002894)

(Dulberg 002895)

(Dulberg 004892)

(Dulberg 004893)

(Dulberg 004894)

(Dulberg 006759)

(Dulberg 006760)

(Dulberg 006761)

(Dulberg 007152)

(Dulberg 007153)

(Dulberg 007154)

On Aug 17, 2015, at 2:19 PM, Hans Mast <hansmast@att.net> wrote:

We have obviously letters saved on our computer. Somethings are saved others are not. We gave you a copy of what we have. I

will have Sheila send you a copy of the Recording of the telephone conversation.. Sent from my iPhone

(Dulberg 001316)

(Dulberg 001317)

(Dulberg 002893)

(Dulberg 002894)

(Dulberg 004892)

(Dulberg 004893)

(Dulberg 006759)

(Dulberg 006760)

(Dulberg 007152)

(Dulberg 007153)

From: Paul Dulberg <pdulberg@comcast.net> Date: August 17, 2015 at 2:40:46 PM CDT To: Hans Mast <hansmast@att.net>

Subject: Re: Case File

Thank you in advance for sending the audio recording.

I noticed none of the medical depositions have been included in the file. Do you have them?

Paul Dulberg 847-497-4250 Sent from my iPad

(Dulberg 001316)

(Dulberg 001317)

(Dulberg 002893)

(Dulberg 002894)

(Dulberg 004892)

(Dulberg 004893)

(Dulberg 006759)

(Dulberg 006760)

(Dulberg 007152)

(Dulberg 007153)

On Aug 17, 2015, at 2:50 PM, Hans Mast <hansmast@att.net> wrote:

We gave you whatever we have. We probably didn't incur the expense for copies. Sent from my iPhone

(Dulberg 001316)

(Dulberg 002893)

(Dulberg 004892)

(Dulberg 006759)

(Dulberg 007152)

From: Paul Dulberg <pdulberg@comcast.net> Date: August 17, 2015 at 3:09:54 PM CDT To: Hans Mast <hansmast@att.net>

Subject: Re: Case File

What company was hired to do the recordings for the medical depositions and what is their contact information?

Thanks again, Paul

Paul Dulberg 847-497-4250 Sent from my iPad

(Dulberg 001316)

(Dulberg 002893)

(Dulberg 004892)

(Dulberg 006759)

(Dulberg 007152)

From: Paul Dulberg <pdulberg@comcast.net> Date: August 26, 2015 at 3:37:06 PM CDT To: Hans Mast <hansmast@att.net>

Subject: Medical Depositions

Hans,

I have found in the paperwork you provided me of the notice of discovery for the Dr's depositions.

All of the paperwork clearly states they were to be deposed before Merrill Legal Solutions on various dates.

Upon contacting Merrill Legal Solutions, none of the Dr's depositions were recorded by that company. In fact, Merrill claims that they did not record any depositions in my case whatsoever.

So, what company did the recording of the Dr's depositions you claimed to have attended?

Paul

Paul Dulberg 847-497-4250

(Dulberg 004887)

(Dulberg 006754)

(Dulberg 007147)

From: Paul Dulberg <pdulberg@comcast.net> Date: September 11, 2015 at 1:35:46 PM CDT To: Hans Mast <hansmast@att.net>

Subject: Voice tape

Hi Hans,

Still Haven't received the actual voice tape/recording listed as gagnon exhibit 2. I can pick it up, please let me know

when.

Thanks,

Paul

Paul Dulberg 847-497-4250 Sent from my iPad

(Dulberg 001310)

(Dulberg 004886)

(Dulberg 006753)

(Dulberg 007146)

(Dulberg 004886)

(Dulberg 006753)

(Dulberg 007146)