

Date : 12/7/2021 4:48:45 AM
From : "Paul Dulberg"
To : "Law Office Of Alphonse Talarico"
BCc : "Paul Dulberg"
Subject : Re: Defendants' Response to Motion To Compel
Dear Mr Talarico,

This was submitted by the defense at the last minute and we need at least a day or two to respond in writing.

Below is raw as I haven't had time to do anything but glance at it;

1. At first glance it doesn't seem Mr Flynn knows the date Julia Williams sent her interrogatories to him.
2. Mr Flynn is a well seasoned attorney and he should know that he should get all deals in writing and notify the court, as well as the clients, that a deal was made to improperly handle discovery.
3. Mr Flynn may have made some sort of verbal deal with Julia Williams. However. without it in writing, notifying the court or the clients of the secrete deal how can he expect a secrete verbal deal to be honored if no one but Flynn and Williams knew about it particularly since Williams is no longer part of the case?
4. Mr Flynn knows making secrete verbal deals without the clients involvement or informing the court of the deal that the deal won't hold up under scrutiny since no one knew it happened other than Mr Flynn and now absent Julia Williams.

I'm just reiterating the same thing over and over. Okay, it's too early in the morning and I should get some coffee, wake up and read his reply in detail before commenting any further.

I think we'll need to ask the judge for a little time to be able to read and properly reply to Mr Flynn's response since the first time I read it was this morning on the day it is to be heard in court.

Thanks,
Paul

On Dec 6, 2021, at 5:58 PM, Alphonse Talarico
<contact@lawofficeofalphonsetalarico.com> wrote:

Please see the attached.

<Defendants' Response to Motion to Compel filed december 6 2021 CC-Civil - 17LA000377 - 12_6_2021 - - - RES - -.pdf>

