

**Date : 1/16/2022 9:11:05 AM**  
**From : "Paul Dulberg"**  
**To : "Alphonse Talarico"**  
**BCc : "Paul Dulberg" , "Tom Kost"**  
**Subject : Fwd: Response to amended complaint is due**  
Dear Mr Talarico,

I am including this forwarded email between Julia Williams and I not because it has to do with either the Gooch or Clinton Discovery but rather because Julia Williams represents that this is the first request Mr Flynn made to ask for more time to answer anything in the case.

This is more than 2 months after Mr Flynn's answers to the Gooch discovery were due.

Thank You,  
Paul

Begin forwarded message:

**From:** Julia Williams <[juliawilliams@clintonlaw.net](mailto:juliawilliams@clintonlaw.net)>  
**Subject: Re: Response to amended complaint is due**  
**Date:** January 11, 2019 at 3:28:32 PM CST  
**To:** Paul Dulberg <[Paul\\_Dulberg@comcast.net](mailto:Paul_Dulberg@comcast.net)>  
**Cc:** Ed Clinton <[ed@clintonlaw.net](mailto:ed@clintonlaw.net)>

Good Afternoon, Paul,  
We have not. Counsel reached out today to ask for an additional two weeks to respond to the complaint. As a matter of professional courtesy, we do not object to these requests; particularly when it is the first request.  
We will keep you posted when we receive a response.  
Best Regards,

Julia Williams  
Of Counsel  
The Clinton Law Firm  
111 W. Washington, Ste. 1437  
Chicago, IL 60602  
P: 312.357.1515  
F: 312.201.0737  
[juliawilliams@clintonlaw.net](mailto:juliawilliams@clintonlaw.net)

This message may be privileged and confidential. If you are not the intended recipient, please delete the email and notify the sender immediately.

On Jan 11, 2019, at 3:04 PM, Paul Dulberg  
<[Paul\\_Dulberg@comcast.net](mailto:Paul_Dulberg@comcast.net)> wrote:

Hi Julia and Ed,

Did we receive the response to the amended complaint?  
Thank's,  
Paul