

Date : 5/18/2022 3:43:39 PM
From : "Alphonse Talarico"
To : "Paul Dulberg"
Subject : Fw: Dulberg v. Popovich
Attachment : image001.jpg; image002.png; image003.png;

Please see Flynn's email and our response.

Sincerely,

Alphonse A. Talarico

From: Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>

Sent: Wednesday, May 18, 2022 3:20 PM

To: Linda Walters <lwalters@karballaw.com>

Subject: Re: Dulberg v. Popovich

Dear Attorney Flynn and Linda Walters,

Thank you for the timely filing of some amended discovery responses of your clients pursuant to the Report of Proceedings dated April 27, 2022 before the Honorable Judge Thomas A. Meyer.

As you recall, your draft order was transmitted to proposed orders after I did not agree to the language you crafted because i wanted to see the Report of Proceedings first. My client paid for a rush preparation of said Report of Proceeding so that we could review and agree to the language of your draft order in a timely manner.

I now see that you have not amended the answers of Defendant The Law Offices of Thomas J. Popovich in accordance with the instructions given by the Honorable Thomas A. Meyer on April 27, 2022.

Additionally, you stated that you would amend the answers to Popovich #2 & #3 as reflected in said report of Proceedings.

Nowhere did you indicate that stipulations will be adequate substitutions for the written and verified discovery answers and Judge Meyer did not authorize said substitutions. Furthermore, I believe what you now rely upon as stipulations are legally inadequate as they are not signed by the parties and the judge.

I have not had the time to review your amended answers for Hans Mast and i do not waive any objection if they do not comply with the Report of Proceedings for April 27, 2022 but a quick review seems to indicate that Hans Mast's amended answers followed the stated intent of the Honorable Thomas A. Meyer.

Sincerely,

Alphonse A. Talarico

From: Linda Walters <lwalters@karballaw.com>

Sent: Wednesday, May 18, 2022 11:04 AM

To: Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>

Cc: George Flynn <gflynn@karballaw.com>

Subject: Re: Dulberg v. Popovich

On behalf of George Flynn, please see the attached:

- DEFENDANT HANS MAST'S SUPPLEMENTAL ANSWERS TO PLAINTIFF'S COURT ORDERED
ADDITIONAL INTERROGATORIES TO HANS MAST; AND
- NOTICE OF SERVICE

Thank you.

Linda Walters

Karbal | Cohen | Economou | Silk | Dunne | LLC

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E: lwalters@karballaw.com

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