

**Date : 10/5/2022 11:01:49 AM**  
**From : "Paul Dulberg"**  
**To : "Alphonse Talarico"**  
**BCc : "Paul Dulberg"**  
**Subject : Fwd: Need clarification on outstanding issues before your departure**

Begin forwarded message:

**From:** Paul Dulberg <[Paul\\_Dulberg@comcast.net](mailto:Paul_Dulberg@comcast.net)>  
**Subject: Need clarification on outstanding issues before your departure**  
**Date:** July 29, 2020 at 1:55:52 PM CDT  
**To:** Ed Clinton <[ed@clintonlaw.net](mailto:ed@clintonlaw.net)>, "Julia C. Williams" <[juliawilliams@clintonlaw.net](mailto:juliawilliams@clintonlaw.net)>  
**Cc:** Mary Winch <[marywinch@clintonlaw.net](mailto:marywinch@clintonlaw.net)>

Hi Ed and Julia,

I would like to ask a few questions before your departure from the case so I can better address some of the issues with possible new counsel.

The list below is not complete but it's a good start to issues I believe are still outstanding.

Outstanding questions on open issues for Clinton firm before departure:

1. Did you send a demand letter? If so, did we receive a response and may I get copies the demand letter and the response?
2. What happened with the objections raised during Dulberg's deposition when Dulberg was questioned about conversations with Dulberg's former counsel Gooch? Did you get a ruling or does that still need to be argued before judge Meyer?
3. Similar to the last question, Have the objections in the Mast deposition been worked out or ruled on by judge Meyer?
4. Did you find out who Gooch was using for an expert witness and did you contact any possible expert witnesses? If so, may I get a copy of their reports and contact information?
5. After you withdraw from this case would you be interested in some sort of limited scope representation or unbundled legal services type of role until I find new counsel and get them up to speed?

Again, Thank you so very much for your help with this case,  
Paul