

Date : 10/17/2022 1:16:16 PM
From : "Paul Dulberg"
To : "Law Office Of Alphonse Talarico"
BCc : "Paul Dulberg" , "Tom Kost"
Subject : Re: Document missing bates number
Dear Mr Talarico,

Thanks to my brother Tom, whom I told you discovered a pattern to Julia Williams mess in the bates stamped documents, I stand corrected on this.

Julia Williams did add these to the Bates stamped documents as:
Dulberg 006350
Dulberg 006686

I am glad to see I was wrong and we don't need to supplement document production based on these documents.

However, further investigation into making sure Julia Williams did submit everything she was provided is still ongoing.

Please forgive my earlier allegations that these were not included.

Thank you again,
Paul

On Oct 7, 2022, at 8:34 AM, Paul Dulberg <Paul_Dulberg@comcast.net> wrote:

Dear Mr Talarico,

I am forwarding the email below that I had preciously sent you because of our discussion on the phone the other day.

Julia Williams selectively chose and did not bates stamp or turn over all the documents Gooch scanned in.

I believe in the past I had found other instances of documents that Gooch scanned in that Julia Williams also did not turn over.

I would need to do a comprehensive comparison between the scanned in documents by Gooch and the bates numbered documents turned over by Williams to identify all documents that Julia Williams chose not to bates stamp and turn over.

This would take months if I have to do it.

It may be easier to just bates stamp all the files from the Gooch file and turn them over even though 99.9% would probably be duplicates.

Again Julia Williams did not bates stamp or turn over other documents as well:

Depositions that were already scanned in by Gooch, bates stamped by Williams and turned over, but the hand written notes were not fully readable.

Julia Williams had me provide her with high resolution photographs of the depositions so that the hand written notes were fully legible, right after Mast's deposition and before her withdrawal that never ended up in the bates stamped documents or turned over.

The Tilschner case, Slip ruling that was sent to her prior to bates stamping or turning over any documents was part 1 of 3 in emails about the 318 case law Mast provided me in November of 2013. Parts 2 and 3 being the LaJato and Choy cases that were bates stamped and turned over and eventually became known as a forged Hans Mist Exhibit 12.

Paul

Begin forwarded message:

From: Paul Dulberg <Paul_Dulberg@comcast.net>

Subject: Document missing bates number

Date: June 29, 2021 at 9:25:58 AM CDT

To: Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>

Dear Mr Talarico,

Please give me a few more days to put all the pieces together, I may come across more files not bates stamped.

Please find "Walgreens.pdf"

This does not exist as a bates stamped document.

This was scanned in by Gooch but not bates stamped or submitted to opposing counsel by Clinton

No date on hand written notes so I am including Dulberg 006686 and Dulberg 006687 in a separate file named "Walgreens Audit.pdf" which has a date of November 27, 2012.

This gives perspective on the date these handwritten notes were written.

These handwritten notes were prior to the Walgreens audit Report and shows this RX receipt was altered long before it was sent to opposing counsel on March 18, 2013 and in fact before any depositions were taken.

The handwritten notes were written at 3 separate times:

1st note describes the issue Dulberg needed to address Due to Popovich claiming that there is no way to prove who paid for the prescriptions because of the April 2012 telephone call between mast and Gagnon (Gagnon exhibit 2) where Gagnon claimed his mother had Paid for the prescriptions:

"Need Timestamp from when this prescription was filled and picked up."

2nd note shows contact information Dulberg found on where to contact to get the information needed:

"Walgreens Custodian of Records
(217)554-8949
8am-5pm Mon-Friday"

3rd note has the phone extension of who Dulberg spoke with when calling the number in note 2, Partial address of the location city, state. zip and fax number to send the request for an audit to be done of the records of the prescriptions Dulberg had filled on 6/28/2011

"Walgreens Custodian of Records
Extension 4039
Danville, IL. 61834
217-554-0955 - Fax Request

This altered Walgreens RX Receipt with Dulberg's hand written notes is found in;

FOLDER: Dulberg Master File
FOLDER: Dulberg Gooch File
FOLDER: Dulberg Paul Dulberg Files From Client
FOLDER: TJP & Attorney Documents
FILE: Walgreens.pdf
PAGE 2:

<Walgreens.pdf>

<Walgreens Audit.pdf>