

Date : 11/7/2022 7:55:14 AM

From : "Paul Dulberg"

To : "Law Office Of Alphonse Talarico"

BCc : "Paul Dulberg"

Subject : Re: Another document relevant to Mast deposition subpoena - missing from Williams/Clinton response

Mast deposition started at 10:00 AM.

The duration of the deposition can be calculated using mast.wav (02:16:06)

Masts deposition ended at exactly 12:16:06 PM

Flynns Email at was sent at exactly 12:31 PM

I believe any reasonable person will find that what is fresh in Flynns mind 15 minutes after the conclusion of the 2 hour and 16 minute Mast deposition stemmed from the mast deposition and definitely makes this email chain relevant.

From source: Subpoena response, Barbara G Smith's Original Thumb Drive: mast.wav

On Nov 7, 2022, at 6:39 AM, Paul Dulberg <Paul_Dulberg@comcast.net> wrote:

Dear Mr Talarico,

I wish to discuss the attached email and how we can use it to open the door to many issues in the motion to exclude and the contempt issue:

Mast deposition begins at 10:00 AM on June 25, 2020

* Wifi issues and breaks most likely caused the natural end time of the deposition to extend.

At 12:31 PM Flynn emails Williams "Just wanted to write while it is fresh in my mind"

* I have no way of determining if this email was sent during or immediately after the Mast deposition.

* The phrase "while it is fresh in my mind" at this time and date, during or immediately after the Mast deposition, can only be interpreted by any reasonable person as directly relevant to the mast deposition since that was the matter at hand.

* The attached email is missing from Julia Williams and Ed Clintons subpoena responses.

* This email being relevant to the mast deposition and speaking to the "dangling issues" of dulberg's deposition opens the door to the whole of the Williams/Clinton

document disclosure and how Williams and Clintons hid files from the various production of documents.

Source of the attached file Dulberg -3.pdf is:

Dulberg Master File/Dulberg Emails August 2020/Dulberg -3.pdf

* I have started to map all the document disclosures and we can discuss that after this relevance discussion takes place.

<Dulberg -3.pdf>