

From: Julia Williams juliawilliams@clintonlaw.net
Subject: Dulberg v Popovich; Documents
Date: June 26, 2020 at 9:41 AM
To: Paul Dulberg pdulberg@comcast.net
Cc: Mary Winch marywinch@clintonlaw.net, Ed Clinton ed@clintonlaw.net



Dear Paul,

I am working to produce more documents to the other side as we indicated in your deposition and pursuant to our duty to continually update discovery. There appear to be some documents from the Gooch file that were not produced in discovery in the legal malpractice case and I want to make sure we have produced everything required to the other side. We are going to produce those now. Many appear to be duplicates.

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4. William McGuire Dep with Notes. Who wrote the notes on the deposition transcript?
5. Notes 1-5. Who wrote the handwritten notes from the five files of handwritten notes attached?

We appreciate your help with this.

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

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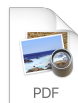
David Gagnon
Dep wi...tes.pdf



Michael McArtor
Dep Wi...tes.pdf



Paul Dulberg
Dep wi...tes.pdf



William McGuire
Dep wi...tes.pdf



Notes 2.pdf

*Dulberg,
Paul
11/11/16*

Kathy A. Kujawa, M.D., Ph.D.
Amita Health Neurosciences Institute
Eberle Medical Building
800 Biesterfield Road, Suite 610
Elk Grove Village, IL 60007
Phone: (847) 981-3630
Fax: (847) 981-3633

*② no change
to gabapentin
③ see me in
5-6 mo
K. Kujawa*

*① I have no other suggestions except
going to a big institution for*

an evaluation (since the "only" work at Little Alexian Brothers")

a) Northwestern Memorial:

DR. Cindy ZadiKoff

OR DR. Tanya Simuni

312-695-1920

b) Rush Medical Center

DR. Katie KompotiFi ^{2:00 PM}

312-563-2900

DR. Cyndi Conellae ^{3:00 PM} (National expert on dystonia)

DR. Jennifer Goldman (dystonia)

312-563-2900

c) Univ of Chicago

DR. TAO XiE 773-702-3038



Notes 4.pdf



Notes 3.pdf

GIBLFRIEND -

TRACY RUSSO
HOLLYWOOD, ALA

DAVID BEAT HER

THRU A ~~NECK~~ DART INTO
JOHN CHOYINSKI'S
NECK

1

D. J. McNamee

From: Paul Dulberg pdulberg@comcast.net
Subject: Re: Dulberg v Popovich; Documents
Date: June 26, 2020 at 12:28 PM
To: The Clinton Law Firm juliawilliams@clintonlaw.net
Cc: Mary Winch marywinch@clintonlaw.net, Ed Clinton ed@clintonlaw.net



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Subject: Re: Dulberg v Popovich; Documents
Date: June 26, 2020 at 1:23 PM
To: Paul Dulberg pdulberg@comcast.net
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GIRLFRIEND -
TRACY RUSSO
HOLLYWOOD, ALA
DAVID BEAT HER
THRU A ~~NECK~~^{DART} INTO
JOHN CHOYINSKI'S
NECK

Page 3 - M...
M...



Notes 2.pdf



Notes 3.pdf



Notes 4.pdf

Dulberg,
Paul
11/11/16

Kathy A. Kujawa, M.D., Ph.D.
Amita Health Neurosciences Institute
Eberle Medical Building
800 Biesterfield Road, Suite 610
Elk Grove Village, IL 60007
Phone: (847) 981-3630
Fax: (847) 981-3633

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to gabapentin
③ see me in
5-6 mo
K. Kujawa

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DR. Cindy ZadiKoff
OR DR. Tanya Simuni
312-695-1920

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DR. Katie Kompoti ^{2:00 PM}
312-563-2900 DR. Cyndi Connell ^{8:30 AM} (National expert on dystonia)
DR. Jennifer Goldman ^{3:00 PM}
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c) Univ of Chicago

DR. TAO XIE 773-702-3038



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Date: June 26, 2020 at 1:43 PM
To: The Clinton Law Firm juliawilliams@clintonlaw.net
Cc: Mary Winch marywinch@clintonlaw.net, Ed Clinton ed@clintonlaw.net

PD

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I can't say how long this will take but I can tell you there is no way I can finish this today

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Date: June 26, 2020 at 3:27 PM
To: The Clinton Law Firm juliawilliams@clintonlaw.net
Cc: Mary Winch marywinch@clintonlaw.net, Ed Clinton ed@clintonlaw.net



Hi Julia,

Ok, I have a question but a short background first

Many of the notes are illegible probably because Gooch scanned these in as black and white yet we used different colors of pens and pencils depending on what was we had available at the time to make the notes.

I dug out the originals which are more legible but some are fading, particularly the ones made with colored pencil.

A good example of this is the gagnon deposition cover page, in Gooch's scan you can read 2 handwritten notes that were written in black ink, the other 4 notes are either missing or can't be read. On The original I can read all of it still but the ones in blue pencil seem to be fading the fastest and can barely be read at all.

Do you want me to incorporate the text of what I can still make out on the originals with who wrote them?

Thanks,
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Dear Paul,

Instead of investing loads of time in rescanning and identifying each note, let's rethink this.

Within the next week, can you determine:

1. For the file titled "Notes 5.pdf" are all of the notes on that file (it is one page) written by Dr. Kathy Kujawa? If not, were they a combination of Dr. Kathy Kujawa and either you, your mother, or your brother?
2. For the depositions and remainder of the "Notes" files (Notes 1-4), are all of those notes written by either you, your brother, or your mother?
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111 W. Washington, Ste. 1437
Chicago, IL 60602
P: 312.357.1515
F: 312.201.0737
juliawilliams@clintonlaw.net

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I would need to see the hand writing on any specific note to say who wrote it.

Mom kept most of her notes on separate papers which is what I am thinking you are referring to as notes 1-5 but am not sure without seeing the writing

Barbs notes are not the most accurate but Toms and mine are.

All three of us went through it separately and tried to see what we could find

Sorry I can't be more specific right now, had an issue at moms today and have been out

Paul

On Jun 26, 2020, at 9:40 AM, Julia Williams <juliawilliams@clintonlaw.net> wrote:

Dear Paul,

I am working to produce more documents to the other side as we indicated in your deposition and pursuant to our duty to continually update discovery. There appear to be some documents from the Gooch file that were not produced in discovery in the legal malpractice case and I want to make sure we have produced everything required to the other side. We are going to produce those now. Many appear to be duplicates.

I am continuing to work on the total supplemental production, but for now, I need your help with some files that I have attached.

1. David Gagnon Dep with Notes. Who wrote the notes on the deposition transcript?
2. Michael McArtor Dep with Notes. Who wrote the notes on the deposition transcript?
3. Paul Dulberg Dep with Notes. Who wrote the notes on the deposition transcript?
4. William McGuire Dep with Notes. Who wrote the notes on the deposition transcript?
5. Notes 1-5. Who wrote the handwritten notes from the five files of handwritten notes attached?

We appreciate your help with this.

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

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

<David Gagnon Dep with Notes.pdf><Michael McArtor Dep With Notes.pdf><Paul Dulberg Dep with Notes.pdf>
<William McGuire Dep with Notes.pdf><Notes 2.pdf><Notes 5.pdf><Notes 4.pdf><Notes 3.pdf><Notes 1.pdf>

<Notes 1.pdf><Notes 2.pdf><Notes 3.pdf><Notes 4.pdf><Notes 5.pdf><David Gagnon Dep with Notes.pdf><Michael
McArtor Dep With Notes.pdf><Paul Dulberg Dep with Notes.pdf><William McGuire Dep with Notes.pdf>





Michael McArtor
Dep Wi...tes.pdf

