


**From:** Paul Dulberg pdulberg@comcast.net   
**Subject:** Mast dep  
**Date:** June 25, 2020 at 1:07 PM  
**To:** Julia C. Williams juliawilliams@clintonlaw.net  
**Cc:** Ed Clinton ed@clintonlaw.net

---



Why is there no actual contact between the supposed independent contractor (Gagnon) and the homeowner/chainsaw owner/ (McGuire's)?

You cannot claim someone is an independent contractor after the fact unless there is some proof he was an independent contractor before the fact


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Ok I can go on and on here

I will wait to hear from you and get the transcripts

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**Date:** June 25, 2020 at 1:33 PM  
**To:** The Clinton Law Firm juliawilliams@clintonlaw.net  
**Cc:** Ed Clinton ed@clintonlaw.net

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**Date:** June 25, 2020 at 1:56 PM  
**To:** The Clinton Law Firm juliawilliams@clintonlaw.net  
**Cc:** Ed Clinton ed@clintonlaw.net

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**Subject:** Re: Mast dep  
**Date:** June 25, 2020 at 4:02 PM  
**To:** Paul Dulberg pdulberg@comcast.net  
**Cc:** Ed Clinton ed@clintonlaw.net, marywinch@clintonlaw.net



Dear Paul,

Thank you for your feedback related to the deposition today. As most of your questions appear to be rhetorical, I am not actually going to address each one, instead, I will reiterate what we discussed. If you do have specific action items/items of discussion, please compile them in a single email and we can set up a time to discuss them.

As I stated in our phone call after, Mast was not testifying as to any independent recollection of the events. He stated several times that he did not recall the individual conversations and testified very generally about the advice provided throughout the representation. He stated that he did not independently recall any of the documents presented—only that he recognized his signature and that he did either create them or cause them to be created. Meaning that he was not disputing the authenticity of the document or email, but could not expound on it. Essentially, we have the documents, but very little first hand testimony from Mast about the case.

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Best Regards,

Julia Williams  
Of Counsel  
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111 W. Washington, Ste. 1437  
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F: 312.201.0737  
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**Date:** June 26, 2020 at 12:59 PM  
**To:** The Clinton Law Firm juliawilliams@clintonlaw.net  
**Cc:** Ed Clinton ed@clintonlaw.net, Mary Winch marywinch@clintonlaw.net

PD

Hi Julia,

I was sending those because the more I thought about the things he said the hotter I got.

I finally walked away and took the night to cool down, in fact I'm walking away from it all till Monday.

I don't think its a good idea for me to comment anymore on the deep until we see it in writing

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