

From: Paul Dulberg
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To: Roona N. Shah
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Date: November 20, 2023

Dear Ms. Roona N. Shah,

This reply is in response to the letter of Edward Clinton and Julia Williams dated November 1, 2023.

Since first filing ARDC Complaints against Edward X. Clinton and Julia C. Williams on July 27, 2023 we have submitted 7 more ARDC Complaints. To date we have submitted:

Edward X. Clinton No. 2023IN02517 (submitted on July 27, 2023)

Julia C. Williams No. 2023IN02518 (submitted on July 27, 2023)

Thomas J. Popovich No. 2023IN03135 (submitted on September 15, 2023)

Hans Mast No. 2023IN03136 (submitted on September 15, 2023)

Brad J. Balke (submitted on November 8, 2023)

Kelly J. Baudin (submitted on November 8, 2023)

William Randall Baudin II (submitted on November 8, 2023)

Thomas W. Gooch (submitted on November 8, 2023)

Sabina Walczyk (submitted on November 8, 2023)

The Complaints submitted November 8, 2023 have footnotes with hyperlinks to exhibits. The Complaints submitted on July 27, 2023 and September 15, 2023 do not have links to exhibits in the footnotes.

Since all these complaints are interrelated and since hyperlinks to exhibits help the reader considerably, we've also produced the following 5 documents that are regularly updated and have full hyperlink features:

[Evidence of Fraud on the Court in 12LA178 During Popovich-Mast Representation](#)

[Evidence of Fraud on the Court in 12LA178 During Balke Representation](#)

[Evidence of Fraud on the Court in 12LA178 During Baudins Representation](#)

[Evidence of Fraud on the Court in 17LA377 During Gooch-Walczyk Representation](#)

[Evidence of Fraud on the Court in 17LA377 During Clinton-Williams Representation](#)

All 5 documents linked above have exhibits placed in a [shared single folder](#). All exhibits are password protected. Please use the following to see hyperlinks and exhibits:

username: ardc5

password: _~5z{se(SKVN

If you need other usernames and passwords, please let us know.

We also use hyperlinks to exhibits in this letter so evidence is easy to view.

Dulberg is providing evidence that the accused attorneys act as a network. Dulberg's legal malpractice attorneys protected Dulberg's personal injury attorneys from being discovered committing fraud against Dulberg. They used a sophisticated system of document and information suppression against their own permanently disabled client. The legal malpractice attorneys shielded the PI attorneys from liability after the PI attorneys committed fraud.

If sued, the PI attorneys use the protection of the legal malpractice attorneys to defend themselves from Dulberg. The PI attorneys claim the 2 year statute of limitations has already passed. But during this same 2 years the PI attorneys were being protected by Dulberg's legal malpractice attorneys (who were actively suppressing documents and information while working against their own client Dulberg).

This is in fact what happened when Dulberg initiated a legal malpractice claim against Popovich and Mast (17LA377). It also happened when Dulberg initiated a legal malpractice claim against the Baudins (22L010905). In both cases defendants Popovich and Mast and the Baudin defendants moved to be dismissed since they claimed more than 2 years had passed since Dulberg "first knew" of any "injury". During those same 2 years they were being protected by Dulberg's own legal malpractice attorneys Gooch-Walczyk and Clinton-Williams who used a sophisticated system of document and information suppression against their permanently disabled client.

This is why what Clinton-Williams and Gooch-Walczyk did to Dulberg cannot be understood in its entirety without looking at what Popovich and Mast (and others) also did to Dulberg. Dulberg's own legal malpractice attorneys were protecting Popovich and Mast (and others) against Dulberg.

The ARDC Complaint against Popovich and Mast describes how Popovich and Mast:¹

- Redirected medical lien liability from the Defendants to Plaintiff
- Forged documents and destroyed evidence (at least 15 examples)
- Corrupted the interrogatory and document production process to sabotage client's case and to benefit defendants (in collaboration with opposing attorneys)
- Suppressed information on mental health issues related to Dulberg's injury
- Corrupted the deposition process to sabotage client's case and to benefit defendants in collaboration with opposing attorneys (9 out of 10 depositions have no valid certification pages)
- Knew Defendant Gagnon effectively admitted to negligence for Dulberg's injury
- Knew Defendant Gagnon committed perjury
- Knew Defendant Carolyn McGuire committed perjury
- Committed settlement fraud
- Violated federal bankruptcy laws

¹ All listed items are linked to supporting evidence on page 1 of 'ARDC Complaint Against Thomas J. Popovich and Hans Mast' and page 1 of [Evidence of Fraud on the Court in 12LA178 During Popovich-Mast Representation](#)

The ARDC Complaint against Balke describes how Balke:²

- Contracted with Dulberg and not with the Bankruptcy Trustee (who had standing as plaintiff)
- Told Dulberg (about 11 weeks later) he would withdraw counsel if Dulberg does not settle with Allstate for \$50,000
- Violated federal bankruptcy laws

The Baudins were retained by Dulberg after Dulberg fired Balke. The ARDC Complaint against the Baudins describes how the Baudins:³

- Contracted with Dulberg instead of with the Bankruptcy Trustee
- Knew or should have known Defendant Gagnon effectively admitted to negligence for Dulberg's injury as early as March, 2013
- Moved to cap the value of PI case 12LA178 (with defendants Allstate alone)
- Closed the deal with an upper cap of \$300,000 (in violation of the automatic stay)
- Coerced Dulberg to agree and misinformed him of where the 'upper cap' came from
- Moved to contract with Bankruptcy Trustee only after capping value of 12LA178
- Misled Bankruptcy Judge that Dulberg wanted Binding Mediation (about 11 weeks after the deal was closed)

Additionally:

- Dulberg's signature was forged onto the ADR Binding Mediation Agreement
- Dulberg was coerced into signing Allstate Release

After these horrendous experiences with PI attorneys, Dulberg retained legal malpractice attorney Gooch (who was recommended by the Baudins). After firing Gooch-Walczyk Dulberg then retained legal malpractice attorneys Clinton-Williams.

- The legal malpractice attorneys Gooch-Walczyk and Clinton-Williams collaborated with opposing counsel to conceal from Dulberg what the personal injury attorneys did to Dulberg. The Baudins covered for Popovich, Mast and Balke.
- Legal malpractice attorneys Gooch-Walczyk then covered for Popovich, Mast, Balke, and the Baudins.
- Legal malpractice attorneys Clinton and Williams then covered for Popovich, Mast, Balke, the Baudins and Gooch-Walczyk.

It is a snowball of fraudulent concealment that keeps growing. For this reason it is not possible to fully understand what Popovich and Mast did (and how they get away with it) without understanding that Dulberg's retained legal malpractice attorneys Clinton-Williams and Gooch-

2 All listed items are linked to supporting evidence on page 1 of 'ARDC Complaint Against Brad J. Balke' and page 1 of [Evidence of Fraud on the Court in 12LA178 During Balke Representation](#)

3 All listed items are linked to supporting evidence on page 1 of 'ARDC Complaint Against Kelly N. Baudin and William Randall Baudin II' and page 1 of [Evidence of Fraud on the Court in 12LA178 During Baudins Representation](#)

Walczyk were covering for Popovich and Mast, Balke and the Baudins (Dulberg's former personal injury attorneys) and how they did it.

'ARDC Complaint against Edward X. Clinton and Julia C. Williams' describes how Clinton and Williams collaborated with opposing counsel to benefit the defendants and sabotage Dulberg's case by suppressing large numbers of documents and playing 'hoaxes' on Dulberg including:⁴

- Document dump hoax⁵:
where an attorney dumps over 6000 documents on their permanently disabled client just before resigning as counsel. The large dump is designed to hide the fact that many of these documents were being released for the first time (because they were being suppressed until then).
- Repeating document hoax⁶:
where an attorney hides documents behind thousands of pages of duplicated, useless and dizzying material. In this case the attorney uses nearly the exact same list of documents arranged in alphabetical order that were released about 14 months earlier and releases them again, also in the exact same alphabetical order, with new bates-stamps claiming they may be new documents but they "aren't sure". This is a great way to appear to give thousands of new pages of documents to opposing counsel without providing a single new document in reality.
- Email hoax⁷:
where an attorney horrendously butchers their own client's emails repeatedly before having them bates-stamped and turned over to opposing counsel.
- Lawyer emails by date hoax⁸:
In this hoax an attorney receives the same email collection they already turned over to opposing counsel (which the client organized by month and year only for his own reference). The attorney treats it as a new release of documents to opposing counsel. The emails are then butchered before being bates-stamped and released to opposing counsel as 'new documents'.

4 All listed items are linked to supporting evidence on page 1 of 'ARDC Complaint against Edward X. Clinton and Julia C. Williams' and page 1 of [Evidence of Fraud on the Court in 17LA377 During Clinton-Williams Representation](#) (The listed items are Chapter 2, Sections A through K in both documents)

5 [Visual Aid 1](#) - Sources of bates order.png and paragraph 40 of 'ARDC Complaint against Edward X. Clinton and Julia C. Williams' and paragraph 40 of [Evidence of Fraud on the Court in 17LA377 During Clinton-Williams Representation](#)

6 [Visual Aid 10](#) - Duplicating long alphabetical list hoax.png and paragraph 48 of 'ARDC Complaint against Edward X. Clinton and Julia C. Williams' and paragraph 48 of [Evidence of Fraud on the Court in 17LA377 During Clinton-Williams Representation](#)

7 [Visual Aid 5](#) - Email hoax.png and paragraph 42 of 'ARDC Complaint against Edward X. Clinton and Julia C. Williams' and paragraph 46 of [Evidence of Fraud on the Court in 17LA377 During Clinton-Williams Representation](#)

8 [Visual Aid 6](#) - Lawyer Emails by date hoax.png and 'ARDC Complaint against Edward X. Clinton and Julia C. Williams', paragraph 42 and [Evidence of Fraud on the Court in 17LA377 During Clinton-Williams Representation](#) paragraph 42

- Hiding key evidence hoax (Tilschner)⁹:
This hoax directly targets and suppresses a key piece of evidence. Even though an attorney downloads 3 documents together with very similar names, somehow the key document is ‘mistakenly’ placed in the wrong folder and is never given to opposing counsel or bates-stamped at all. Then, somehow, one of the accompanying documents is copied, given a new name, and placed back with the group to appear to substitute for the ‘misplaced’ document.
- 17LA377 document insertion hoax¹⁰:
This is where an attorney takes many documents from the Common Law Record of the current case (that don’t need to be bates-stamped and turned over to opposing counsel) and separates them from the others, renames all of them, and then adds them (in alphabetical order) to the documents that the attorney will bates-stamp and turn over to opposing counsel. This is a way to pad your bates-stamped documents with hundreds of pages of useless documents to further confuse your permanently disabled client.

Clinton and Williams used a sophisticated system of document and information suppression against their permanently disabled client to:

- Conceal Dulberg’s bankruptcy (from the 17LA377 Common Law Record and Reports of Proceedings)
- Suppress emails from Saul Ferris
- Suppress key evidence (Tilschner v Spangler certified slip ruling)
- Suppress large numbers of emails from Brad Balke
- Collaborate with opposing attorney to flood Dulberg with over 6,000 documents just before Clinton-Williams withdrew as Dulberg’s counsel
- Suppress all information on what the Baudins did to Dulberg
- Suppress evidence that Defendant Gagnon effectively admitted negligence for Dulberg’s injury as early as March, 2013.
- Collaborate with opposing counsel to suppress Barch documents before Dulberg’s deposition
- Collaborate with opposing counsel to weaken verification pages of discovery production
- Collaborate with opposing counsel during the deposition of Hans Mast and after

In addition, the ARDC Complaint Against Thomas W. Gooch and Sabina Walczyk describes how Gooch-Walczyk and Clinton-Williams ‘teamed-up’ to:¹¹

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- 9 [Visual Aid 4 - Tilschner hoax.png](#) and Chapter 2 Section C and K of ‘ARDC Complaint against Edward X. Clinton and Julia C. Williams’ and same sections in [Evidence of Fraud on the Court in 17LA377 During Clinton-Williams Representation](#)
- 10 [Visual Aid 3 - 377 document insertion hoax.png](#) and paragraph 9 of ‘ARDC Complaint against Edward X. Clinton and Julia C. Williams’ and paragraph 9 of [Evidence of Fraud on the Court in 17LA377 During Clinton-Williams Representation](#)
- 11 All listed items are linked to supporting evidence on page 1 of ‘ARDC Complaint Against Thomas W. Gooch and Sabina Walczyk’, and page 1 of [Evidence of Fraud on the Court in 17LA377 During Gooch-Walczyk Representation](#). (They are “TEAM-WORK” Examples 1 through 5)

- Conceal key evidence in collaboration with each other (Tilschner v Spangler certified slip ruling)
- Conceal admission of negligence of Defendant Gagnon for Dulberg's injury in underlying case 12LA178 in collaboration with each other
- Conceal Bankruptcy and Violations of Federal Bankruptcy Laws (automatic stay, loss of standing to pursue claim, capping value of assets in BK estate, etc) in collaboration with each other
- Conceal true sources of \$300,000 upper cap on the value of the PI claim in collaboration with each other
- Intentionally confuse Statute of Limitations toll date, date of "injury", and placing Dulberg's privileged attorney-client communications at issue in collaboration with each other

Dulberg hoax¹² shows a common 'inside joke' of mocking Dulberg by referring to him as 'Duh'-lberg. The 'inside joke' began with Popovich-Mast and was continued by legal malpractice attorneys Gooch-Walczyk and Clinton-Williams. A court reporter also shared the inside joke¹³ by mocking Dulberg when naming a court document.

What Popovich and Mast did to Dulberg has to be looked at to fully understand what Clinton-Williams and Gooch-Walczyk did to Dulberg. The malpractice attorneys were intentionally deceiving Dulberg to hide from Dulberg what the PI attorneys did to him. The legal malpractice attorneys also set up conditions which allowed the defendants to claim Dulberg did not file a complaint within 2 years of when he "knew" or "should have known" of any "injury" done to him by the PI attorneys. They even shared the same inside jokes, both referring to their permanently disabled client as 'Duhlberg'. The PI attorneys then claimed it was 'too late' for Dulberg to file a lawsuit since he "first knew" or "should have known" of a possible "injury" more than 2 years earlier (while the legal malpractice attorneys hid from Dulberg all the acts of fraud). This is how the network is intentionally designed to work: The legal malpractice attorneys help set up a 2 year statute of limitations Summary Judgment 'escape hatch' for the Defendants so that any cases against them will be dismissed.

The overall methods of how Dulberg's legal malpractice attorneys worked together to sabotage Dulberg's legal malpractice case 17LA377 against Popovich and Mast can also be seen in a series of 9 tables.

Table 1 shows¹⁴ 4 different efforts that Popovich, Mast, Balke and the Baudins made to place an 'upper cap' on the value of Dulberg's PI case 12LA178. Dulberg reacted to the first effort by filing for bankruptcy. The next 3 attempts were made after Dulberg declared bankruptcy and in

12 [Visual Aid 11](#) - Mocking client.png Gooch once again referred to his permanently disabled client as 'Duhlberg' in an angry letter Gooch sent to Dulberg (see 'ARDC Complaint Against Thomas W. Gooch and Sabina Walczyk', paragraph 93 and [Evidence of Fraud on the Court in 17LA377 During Gooch-Walczyk Representation](#) paragraph 93)

13 [Group Exhibit 42](#)_17LA377 purchased by Dulberg/Reports of Proceedings_Folders-Year-Month-Day-Case_Original file names/2018-11-13_17LA377_Duhlberg/

14 'ARDC Complaint Against Kelly N. Baudin and William Randall Baudin II', page 22 and [Evidence of Fraud on the Court in 12LA178 During Baudins Representation](#) page 22

violation of the automatic stay and without informing the bankruptcy trustee. The 4th and final attempt place an ‘upper cap’ on the value of PI case 12LA178 was done successfully by the Baudins and Defendants Allstate, acting alone on or before August 10, 2016. Joseph Olsen, who first received permission to retain the Baudins about 11 weeks later, wasn’t even appointed the bankruptcy trustee until August 31, 2016.

Table 2 shows¹⁵ strategies and methods of 5 law firms retained by Dulberg. All successive attorneys to the same (fully disabled) client used the same overall strategy: To intentionally weaken or sabotage their own client’s case.

All three personal injury attorneys retained by Dulberg acted in violation of the automatic stay. They continued to appear in the 22nd Judicial Circuit Court (which operated for approximately 25 months in violation of the automatic stay) claiming to represent Dulberg (who had no standing as plaintiff). All 3 PI attorneys made efforts to place a cap on the remaining case without having any authority from the Bankruptcy Court to do so. Both legal malpractice attorneys suppressed all information of how all 3 PI law firms violated federal bankruptcy laws from Dulberg and from the complaints.

All five law firms (3 personal injury law firms and 2 legal malpractice law firms) knew or could easily have discovered that personal injury defendant (who was operating the chainsaw that injured Dulberg) Gagnon effectively admitted negligence for Dulberg’s injury as early as March, 2013. None of the 5 law firms ever informed Dulberg of this. The original defendant and operator of the chainsaw, Gagnon, admitted to being negligent:

About 10 months before Dulberg was coerced into settling with the owners of the property (the McGuire’s) on which the accident occurred and for whom Gagnon was working.

About 21 months before Dulberg declared bankruptcy.

About 39 months before any binding mediation agreement with Gagnon was mentioned.

About 40 months before any cap was placed on any binding mediation award from Gagnon.

There was no reason for any of these activities to take place if the defendant who operated the chainsaw already admitted to being negligent.

Table 3 shows¹⁶ 5 incorrect versions of the origin of the \$300,000 ‘upper cap’ placed on the value of PI case 12LA178 given by Dulberg’s own attorneys. None of the 5 versions are what Dulberg told his attorneys. In addition, the true origin of the ‘upper cap’ is clearly documented in 17LA377 Reports of Proceedings from June 13, 2016 to August 10, 2016. The ‘upper cap’ was placed on the value of 17LA377 by the Baudins and Defendants Allstate acting alone and over 7 weeks before the Baudins were authorized by the Bankruptcy Court to act on behalf of the bankruptcy estate. The Baudins and Defendants Allstate acted alone to set a \$300,000 ‘upper cap’ on the value of PI case 12LA178 about 3 weeks before bankruptcy trustee Olsen was appointed as bankruptcy trustee.

15 ‘ARDC Complaint Against Thomas W. Gooch and Sabina Walczyk’, page 3 and [Evidence of Fraud on the Court in 17LA377 During Gooch-Walczyk Representation](#), page 3

16 ‘ARDC Complaint Against Thomas W. Gooch and Sabina Walczyk’, page 36 and [Evidence of Fraud on the Court in 17LA377 During Gooch-Walczyk Representation](#) page 36

Table 4A shows¹⁷ 3 incorrect versions of when Dulberg “first knew” of an “injury” given by Dulberg’s counsel. Table 4B shows Table 4A in a simpler form.¹⁸ Evidence shows that Gooch was already setting Dulberg up to lose on a 2 year statute of limitations argument during their first meeting together.¹⁹

Tables 3, 4A and 4B taken together show the methods used by Dulberg’s own legal malpractice attorneys to attempt to discredit Dulberg and sabotage his case against Popovich and Mast. They simply made multiple contradictory and untrue statements in the 17LA377 Common Law Record and in the Records of Proceedings on behalf of Dulberg without his permission or knowledge. Tables 3, 4A and 4B show the base logic Gooch-Walczyk and Clinton-Williams used to set Dulberg up to fail.

The logic used in Tables 3, 4A and 4B led to the claims of statute of limitations toll dates shown in Tables 5A and 5B. Table 5A shows²⁰ toll dates given by opposing counsel Flynn. Table 5B shows²¹ toll dates given by Dulberg’s own attorneys Gooch-Walczyk and Clinton-Williams.

Table 6 shows²² how key elements of opposing counsel Flynn’s Summary Judgment arguments in 2022 were set up with the help of Dulberg’s own legal malpractice attorneys since 2016. Flynn’s Summary Judgment argument is broken down into 29 key elements. Elements are shown to be directly related to something Dulberg’s own legal malpractice attorneys did to Dulberg. Table 6 shows how Dulberg was set up to fail by his own legal malpractice attorneys from the first day Dulberg met Gooch.

Table 7 shows²³ how current Illinois law was applied by Officers of the Court in 17LA377 to Dulberg’s case. The key statements made in defense of granting Summary Judgment to Defendants Popovich and Mast are gathered and compared.

Table 8 shows²⁴ patterns of collaboration between Gooch-Walczyk and Clinton-Williams on numerous issues. Dulberg retained Clinton-Williams almost 2 years after first retaining Gooch. It was not possible for Clinton-Williams to successfully suppress key documents unless Gooch-Walczyk suppressed the same key documents before them. They both did so to benefit Popovich and Mast among others.

17 ‘ARDC Complaint Against Thomas W. Gooch and Sabina Walczyk’, page 41 and [Evidence of Fraud on the Court in 17LA377 During Gooch-Walczyk Representation](#) page 41

18 ‘ARDC Complaint Against Thomas W. Gooch and Sabina Walczyk’, page 42 and [Evidence of Fraud on the Court in 17LA377 During Gooch-Walczyk Representation](#) page 42

19 ‘ARDC Complaint Against Thomas W. Gooch and Sabina Walczyk’, from first paragraph and [Evidence of Fraud on the Court in 17LA377 During Gooch-Walczyk Representation](#) from first paragraph

20 ‘ARDC Complaint Against Thomas W. Gooch and Sabina Walczyk’, page 65 and [Evidence of Fraud on the Court in 17LA377 During Gooch-Walczyk Representation](#) page 65

21 ‘ARDC Complaint Against Thomas W. Gooch and Sabina Walczyk’, page 67 and [Evidence of Fraud on the Court in 17LA377 During Gooch-Walczyk Representation](#) page 67

22 ‘ARDC Complaint Against Thomas W. Gooch and Sabina Walczyk’, page 69 and [Evidence of Fraud on the Court in 17LA377 During Gooch-Walczyk Representation](#) page 69

23 ‘ARDC Complaint Against Thomas W. Gooch and Sabina Walczyk’, page 84 and [Evidence of Fraud on the Court in 17LA377 During Gooch-Walczyk Representation](#) page 84

24 ‘ARDC Complaint against Edward X. Clinton and Julia C. Williams’, page 139 and [Evidence of Fraud on the Court in 17LA377 During Clinton-Williams Representation](#) page 139

Table 9 shows²⁵ 3 different cases of fraud on the court committed at Dulberg's expense. The first was during personal injury case 12LA178. When Dulberg was pressured to settle the remainder of the case for a low amount Dulberg reacted by declaring bankruptcy which opened a federal bankruptcy case in addition to PI case 12LA178. When Dulberg was later forced to accept an 'upper cap' of \$300,000 on the value of the PI case Dulberg reacted by initiating legal malpractice claim 17LA377 against Popovich and Mast.

In addition to committing fraud against Dulberg, the named attorneys participated in a series of frauds on the judicial mechanism of the court.²⁶

"Fraud upon the court" has been defined by the 7th Circuit Court of Appeals to "embrace that species of fraud which does, or attempts to, defile the court itself, or is a fraud perpetrated by officers of the court so that the judicial machinery can not perform in the usual manner its impartial task of adjudging cases that are presented for adjudication."²⁷

The 7th Circuit further stated:

"a decision produced by fraud upon the court is not in essence a decision at all, and never becomes final."²⁸

Fraud on the court is a fraud:

"directed to the judicial machinery itself and is not fraud between the parties or fraudulent documents It is thus fraud where . . . the impartial functions of the court have been directly corrupted."²⁹

Interestingly, the term "fraud on the court" is only mentioned in Rule 60(d)(3) of the Federal Rules of Civil Procedure, yet courts have also used this doctrine to order dismissal or default under other rules where a litigant has stooped to the level of fraud on the court.³⁰

Clinton and Williams claimed: *"During the time the Clinton Law Firm represented Paul Dulberg, they did so with the competence and diligence required of attorneys in Illinois.... It betrays common sense that a law firm, as Mr. Dulberg alleges, would intentionally jeopardize its own client's cause of action, especially when its own recovery was contingent upon any recovery it obtains on behalf of its client."*

25 'ARDC Complaint against Edward X. Clinton and Julia C. Williams', page 144 and [Evidence of Fraud on the Court in 17LA377 During Clinton-Williams Representation](#) page 144

26 Fraud on the Court quotes from "Fraud on the Court and Abusive Discovery" (2016) David R. Hague, St. Mary's University School of Law

27 Kenner v. C.I.R., 387 F.3d 689 (1968); 7 Moore's Federal Practice, 2d ed., p. 512, Â¶ 60.23.

28 Kenner v. C.I.R., 387 F.3d 689 (1968); 7 Moore's Federal Practice, 2d ed., p. 512, Â¶ 60.23

29 (Robinson v. Audi Aktiengesellschaft, 56 F.3d 1259, 1266 (10th Cir. 1995) (emphasis added) (citation omitted))

30 See, e.g., Combs v. Rockwell Int'l Corp., 927 F.2d 486, 488 (9th Cir. 1991) (relying on Rule 11 where counsel made thirty-six changes on a deposition errata sheet after the client advised that the transcript was accurate and the testimony was correct); Brockton Sav. Bank v. Peat, Marwick, Mitchell & Co., 771 F.2d 5, 11-12 (1st Cir. 1985) (affirming district court's entry of default judgment under court's inherent powers in response to defendant's abusive litigation practices); Wyle v. R.J. Reynolds Indus., Inc., 709 F.2d 585, 589 (9th Cir. 1983) ("[C]ourts have inherent power to dismiss an action when a party has willfully deceived the court and engaged in conduct utterly inconsistent with the orderly administration of justice."); Eppes v. Snowden, 656 F. Supp. 1267, 1279 (E.D. Ky. 1986) (finding that where fraud is committed upon the court, the court's power to dismiss is inherent "to protect the integrity of its proceedings").

We have provided evidence of 5 consecutive law firms retained by Dulberg doing just that, the Clinton Law Firm being the 5th in a row. We have provided detailed evidence of how Clinton and Williams suppressed Dulberg's documents step by step. After having been the targets of these attacks for over 1 decade, we've found the process is not that difficult to understand. What follows is a simple 13 step approach a legal malpractice attorney can take to sabotage their own client's case that is simple enough for an average person to understand. (This approach matches point for point what Dulberg experienced with Gooch-Walczyk and Clinton-Williams.)

1) bury key evidence:

This is the legal equivalent of 'crippling' ones own client.

2) bury fraud:

Bury all evidence of defendant committing fraud on your client.

3) prepare escape hatch:

A 2 year SoL dismissal is pre-planned into the system. Dulberg was being intentionally set up for it during his first meeting with Gooch.

4) choke client:

Not all documents are suppressed equally. The documents sent directly from the client to the legal malpractice attorney are primary targets of suppression.

5) give some, keep some, ghost some:

This is a sophisticated system of document and information suppression described in Chapter `1 of 'ARDC Complaint Against Edward X. Clinton and Julia C. Williams'. ³¹

6) mince emails:

Methods used against Dulberg are described from paragraph 42 of 'ARDC Complaint Against Edward X. Clinton and Julia C. Williams'.

7) bury troublesome issues:

How to do it: Make multiple contradictory and untrue statements on the issues on behalf of ones client in the Common Law Record and in Reports of Proceedings. These statements are intended as gifts for the defendants. They were created by the legal malpractice attorneys but they are credited to Dulberg (as if the attorney received the information from Dulberg). The defense will use the multiple statements later to claim your client is 'being evasive' and 'changing his story' by 'fiddling' with his answers. An excellent example is shown in Table 3. Other excellent examples are Table 10 (page 12) and Table 11 (page 14).

8) target depositions:

From our experience depositions are a prime target of an attorney that wants to destroy your case. In the underlying PI case 12LA178 there are no valid certification page for 9 out of 10 depositions. Evidence of forgery exists in many of the alleged certification pages. The strange deposition of Mast is described in 'ARDC Complaint Against Edward X Clinton and Julia C. Williams', Chapter 2, Section 2-K, in which key evidence disappears. The history of the key evidence which disappeared is described in Chapter 2, Section 2-C of the same complaint and Table 10 (page 12).

³¹ Also in [Evidence of Fraud on the Court in 17LA377 During Clinton-Williams Representation](#) Chapter 1

9) **strip case law:**

when dealing with client misinterpret and misrepresent case law. An example is when Mast used Tilschner v Spangler as the reason the McGuires were not liable for Gagnon's injury during a meeting with Dulberg and Thomas Kost on November 20, 2023. Another example: The relevant case law in 17LA377 which applies to Dulberg's case (*Suburban* and related cases) was never brought up to Dulberg by Gooch-Walczyk or Clinton-Williams.

10) **starve and flood:**

Just before quitting as counsel, dump a waterfall of documents on your permanently disabled client. Hide most of the documents you have been suppressing until then near the bottom of the pile. Continue to suppress certain key documents and never give them a bates-stamp or turn them over to opposing counsel. Overload your client and head to the door. Described in 'ARDC Complaint Against Edward X. Clinton and Julia C. Williams', Chapter 1, beginning on paragraph 35.³²

11) **set up accused:**

Described in detail in Table 6 ³³

12) **throw privilege under a bus:**

This is demonstrated step by step in 'ARDC Complaint Against Thomas W. Gooch and Sabina Walczyk' from paragraph 1.³⁴ Give the defense grounds to demand your client's privileged attorney-client communications. This is done by setting the client up to make the claim that they "first knew" of an "injury" through communications with their legal malpractice attorney. (This is what Gooch did to Dulberg at their first meeting together.)

13) **run for cover stories:**

Stellar examples of this are claims made by Clinton and Williams in the letter of November 1, 2023 and examined in this reply.

This is a basic 13 step outline which matches (step by step) what Gooch and Walczyk and later Clinton and Williams actually did to Dulberg.

Complications in Dulberg's case:

What if the targeted client declares bankruptcy during his PI case as a natural reaction to losing all financial hope? Federal bankruptcy laws add a number of complications to finishing off your client. This is what happened to Dulberg during PI case 12LA178.

A way to solve it:

- a) Ignore bankruptcy court and bankruptcy court trustee.
- b) Make repeated efforts to place an 'upper cap' on the value of PI case 12LA178.
- c) Do not inform the bankruptcy trustee until an 'upper cap' is already in place and treated as

32 Also in [Evidence of Fraud on the Court in 17LA377 During Clinton-Williams Representation Chapter 1](#), beginning on paragraph 35

33 ARDC Complaint Against Thomas W. Gooch and Sabina Walczyk', page 69 and [Evidence of Fraud on the Court in 17LA377 During Gooch-Walczyk Representation page 69](#)

34 Also in [Evidence of Fraud on the Court in 17LA377 During Gooch-Walczyk Representation](#) from paragraph 1

a ‘done deal’.

d) Hide the origins of the ‘upper cap’ from your client.

This is what happened to Dulberg point by point. In short, *ram it through anyway*.

Clinton and Williams claimed: “*Mr. Dulberg subsequently sued his attorneys in the personal injury matter, Thomas Popovich and Hans Mast, alleging that they should not have recommended settlement and claimed that the settlement amount was insufficient.*”

Dulbergs emails with Clinton and Williams and email attachments are available at these links:

[Emails_Clinton Firm-Dulberg](#)

[email attachments](#)

Table 10 below shows the number of times Dulberg informed his legal malpractice attorneys about the importance of Tilschner v Spangler with links to evidence:

When Informed		How Informed
2016-12-16	first meeting with Gooch	document handed Gooch
2018-10-01	letter to Gooch (that led to Gooch firing)	email linked (on page 30) attached document: second_amended_complaint_comments.txt
2018-10-10	preparing for first meeting with Clinton-Williams	email linked attached folder: Duberg Complaint document: second_amended_complaint_comments.txt
2018-10-12	first meeting with Clinton-Williams	Text document and problems with Gooch were explained at meeting ³⁵
2018-12-04	preparing Second Amended Complaint	email linked attached documents: Working.pdf comment on complaint.txt
2018-12-05	preparing Second Amended Complaint	email linked attached document: comments on Dulberg Second Amended Complaint REDLINED 2018 Dec .txt
2019-03-18	preparing discovery documents	email linked document: IndependantContractor-CaseLaw1_Mast.pdf
2019-07-08	inspecting defendants documents	email linked attached folder: To Julia documents: questions_for_mast.txt timeline_of_mcguire_settlement.txt
2019-07-22	inspecting defendants documents	email linked attached folder: To Julia documents: questions_for_mast.txt timeline_of_mcguire_settlement.txt
2019-11-19	updating information	email linked attached document: 2109-11-19_updated_timeline_of_mcguire_settlement.txt

35 On October 19, 2018 PDF files were created by Clinton or Williams in “Dulberg Master File” concerning the Tilschner case: Shown in [Visual Aid 4 - Tilschner hoax.png](#)

When Informed		How Informed
2020-02-06	preparing for Mast deposition	email linked attached documents: questions_for_mast.txt timeline_of_mcguire_settlement.txt
2020-02-08	preparing for Mast deposition	email linked attached documents: 2109-11-19_updated_timeline_of_mcguire_settlement.txt questions_for_mast.txt
2020-06-18	preparing for Mast deposition	email linked attached document: evidence_list.txt questions_for_mast.txt
2020-06-24	preparing for Mast deposition	email sent at 1:56AM linked attached documents: 2020-06-23_updated_timeline_of_mcguire_settlement.txt email sent at 10:05AM linked attached documents: 2020-06-23_updated_timeline_of_mcguire_settlement.txt
2020-06-24	meeting before Mast deposition	Clinton and Williams were told by Thomas Kost of the importance of Tilschner v Spangler in proving 'intentional tort' and 'fraud' during the meeting

Table 10 demonstrates that Clinton and Williams actively blocked what Dulberg told them, suppressed documents and information, and substituted whatever they wanted Dulberg to 'allege'. They then claimed it came from Dulberg. When Clinton and Williams claim that "Dulberg alleges...", what follows is ***whatever they (and Gooch-Walczyk) wished to force on Dulberg.***

Clinton and Williams claimed: *"He further alleged that Messrs. Popovich and Mast failed to properly investigate his claims, failed to apply relevant case law, and failed to determine an appropriate strategy for recovery."*

After reviewing the opposing party's May 29, 2019 document disclosure for the first time, on June 8, 2019 Dulberg sent this folder to Williams: [To Julia](#)

The folder contains a file called [_READ_ME.txt](#) which states:

"The opposing counsel has released one "smoking gun" document that we've never seen before. It is (pop 192). Paul never gave Mast authorization to make this offer. We have ample evidence that Paul never authorized the offer made in (pop 192) and he knew nothing about it until seeing it last week. Note that it is not in the box of files we gave to you. It is not in the box of files that Mast gave to Paul when Mast withdrew from counsel. Also, the Baudin law firm and the Gooch law firm never saw this document."

"Since we were never able to see (pop 192) until now, we never understood the details of how Mast tricked Paul into such a small settlement. The fact that Mast initiated the settlement process through (pop 192) without Paul's knowledge or permission is proof that this case is about more than Mast's negligence. It is about willful intent or malicious intent to deceive his client.

Of course you will need convincing proof that (pop 192) was initiated without Paul's knowledge. We have that proof. As I fill in the timeline more and more, the evidence will be stronger and stronger."

Dulberg called for a meeting on July 8, 2019 (in the same email) to discuss this new

development. Dulberg was ignored for almost 1 year. Clinton and Williams finally met with Dulberg and Thomas Kost by phone on June 24, 2020 (one day before the deposition of Mast).

Table 11 below shows the number of times Dulberg informed his legal malpractice attorneys about “overwhelming evidence” of intentional tort or fraud since first discovering evidence in the first week of July, 2019:

When Informed		How Informed
2019-07-08	after first receiving defendants document disclosure	email linked attached folder: To Julia documents: READ_ME.txt timeline_of_mcguire_settlement.txt questions_for_mast.txt
2019-07-22	reminding Williams	email linked attached folder: To Julia documents: READ_ME.txt timeline_of_mcguire_settlement.txt questions_for_mast.txt
2019-11-19	reminding Williams again	email linked attached document: 2109-11-19_updated_timeline_of_mcguire_settlement.txt
2020-02-06	preparing for Mast deposition	email linked attached documents: questions_for_mast.txt timeline_of_mcguire_settlement.txt
2020-02-08	preparing for Mast deposition	email linked attached documents: 2109-11-19_updated_timeline_of_mcguire_settlement.txt questions_for_mast.txt
2020-06-18	preparing for Mast deposition	email linked attached document: evidence_list.txt questions_for_mast.txt
2020-06-24	preparing for Mast deposition	email sent at 1:56AM linked attached documents: 2020-06-23_updated_timeline_of_mcguire_settlement.txt email sent at 10:05AM linked attached documents: 2020-06-23_updated_timeline_of_mcguire_settlement.txt
2020-06-24	meeting before Mast deposition	At meeting Thomas Kost (after waiting about 1 year for meeting) explained to Clinton and Williams that there is “overwhelming evidence” that Popovich and Mast committed fraud and intentional tort.

Dulberg was alleging Popovich and Mast intentionally committed fraud from July 8, 2019 onward to Clinton and Williams (while claiming to have a ‘smoking gun’ document he found that proved it). Dulberg tried to set up a meeting with Clinton and Williams for about 1 year to discuss the consequences of the new discovery of fraud on the case.

At the June 24, 2020 meeting Thomas Kost (after waiting about 1 year to do so) explained to Clinton and Williams that there is “overwhelming evidence” that Mast and Popovich committed intentional tort and fraud. Thomas Kost explained that the 6 points listed in the document [evidence_list.txt](#) provides “overwhelming evidence” that Mast and Popovich committed intentional tort and fraud. Clinton made no comment after Thomas Kost explained this.

This information was suppressed and ignored by Clinton and Williams since July 8, 2019. They “choked the client” to “bury fraud” or they would have lost the 2 year SoL ‘escape hatch’ for defendants Popovich and Mast. What they did can be understood as: **choke client to bury key**

evidence, bury fraud, and set up escape hatch.

Clinton and Williams claimed: “*Mr. Dulberg’s settled his claim with the McGuires for \$5,000, and was awarded a gross amount of \$660,000 in his claim against Mr. Gagnon after binding mediation in December 2016.*”

Clinton and Williams claimed: “*Mr. Dulberg collected \$300,000 from the insurance company and was unable to collect from Mr. Gagnon personally.*”

Table 3 shows³⁶ that this statement by Clinton and Williams is the 5th contradictory and incorrect statement made by Dulberg’s legal malpractice attorneys on behalf of Dulberg on the subject of the \$300,000 ‘upper cap’ that was placed on the value of PI case 12LA178. None of the 5 statements in Table 3 were made by Dulberg. All 5 statements were made by Dulberg’s attorneys. None of the 5 statements are accurate. They were made to set Dulberg up. Court records (12LA178 ROP from June 13, 2016 to August 10, 2016) unambiguously prove **who** placed an ‘upper cap’ on the value of 12LA178, **when** they did it and **where** they did it. The evidence was easily available to both Gooch-Walczyk and Clinton-Williams the entire time. This information was concealed from Dulberg by his own attorneys. Instead, they blamed Dulberg for the ‘upper cap’ or ignored it (which protected the Baudins and Allstate).

- a) **Who** placed a \$300,000 upper cap on the value of the personal injury case (***The Baudins and Allstate alone***)
- b) **When** the agreement was made (***On or before August 10, 2016 in violation of the automatic stay***)
- c) **Where** the agreement was made (***In the 22nd Judicial Circuit Court***)

This is then blamed on Dulberg or ignored. They are then called ‘claims’ of Dulberg. (**‘bury troublesome issues’**)

Clinton and Williams claimed: “*Mr. Dulberg retained Thomas Gooch of The Gooch Firm, who filed on behalf of Mr. Dulberg the initial complaint for legal malpractice on November 28, 2017 (Exhibit 2), followed by a first amended complaint. (Exhibit 3) ... The Clinton Law Firm represented Paul Dulberg in a legal malpractice claim from November 8, 2018, to September 10, 2020, in a case then-pending in the Circuit Court for the 22 nd Judicial Circuit, McHenry County. The matter is docketed as Dulberg v. the Law Office of Popovich, P.C. and Hans Mast, 2017 LA 377.*”

In all 3 filings of a Complaint (Complaint at Law by Gooch-Walczyk, the Amended Complaint by Gooch-Walczyk, and the Second amended Complaint by Clinton-Williams) only 2 defendants were named:

Hans Mast

The Law Office of Thomas J. Popovich

Thomas J. Popovich was never named as a defendant by either Gooch-Walczyk or Clinton-

³⁶ ARDC Complaint against Thomas W.Gooch and Sabina Walczyk page 35-36 and [Evidence of Fraud on the Court in 17LA377 During Gooch-Walczyk Representation](#) page 35-36

Williams. The Baudins were never named or mentioned by name in any Complaint. Balke was never named or mentioned by name in any Complaint. They were protected.

Clinton and Williams claimed: *“At the time of CLF’s involvement, the legal malpractice matter was still in discovery, and much of CLF’s efforts during its representation of Mr. Dulberg was focused on discovery: it issued and responded to written discovery requests, took and defended depositions of fact witnesses, and address issues concerning privilege.”*

How Clinton and Williams conducted discovery is documented in detail in Chapter 1 and Chapter 2, Sections A through L of ‘ARDC Complaint Against Edward X. Clinton and Julia C. Williams’.

Clinton and Williams claimed: *“The defendants’ primary defense was that Mr. Dulberg’s legal malpractice claims were barred by the applicable two-year statute of limitations.”*

This is the ‘escape hatch’ which Dulberg’s legal malpractice attorneys gave the defendants as a gift and which Gooch set up since his first meeting with Dulberg on December 16, 2016. When Dulberg raised the issue of Intentional Tort and Fraud on July 8, 2019 onward, Clinton and Williams ignored and suppressed it to keep this escape hatch open (**‘bury fraud’**).

Clinton and Williams claimed: *“As such, the issue of when Mr. Dulberg discovered his claims became relevant in the litigation. Mr. Dulberg claimed that he did not discover the injury until consulting with Mr. Gooch in December 2016.”*

This is what Gooch told Dulberg at their first meeting. It is a statement that has been attributed to Dulberg and blamed on Dulberg ever since (from December 16, 2016 to the letter of November 1, 2023 by Clinton and Williams to the ARDC).

Tables 4A and 4B show Gooch-Walczyk and Clinton-Williams attributed the statement Gooch made to Dulberg on December 16, 2016 to Dulberg himself. The statement was first made by Gooch the legal malpractice attorney with authority and an air of certainty to the client during their first meeting together. The statement was later transferred to the client and blamed on the client himself .

Gooch asserted the statement, not Dulberg. Gooch informed Dulberg that Gooch is considered an expert on such matters and their first meeting together is when the statute of limitations is tolled. This was later changed to ‘Dulberg’s claim’.

Does the Clinton and Williams statement above pass a basic reality check?

Gooch is a legal malpractice attorney with over 20 years experience. Clinton is a legal malpractice attorney with over 20 years experience. Yet both imply that it was Dulberg that unilaterally decided that the toll starts at his first meeting with Gooch. Some reality checks:

- Did Gooch have any theory of when the statute of limitations begins to toll? What was it?
- How did Dulberg come up with the idea that the statute of limitations begins to toll from his first meeting with Gooch? How and when did the idea first enter his head?
- After more than 20 years of experience as a legal malpractice attorney in Illinois, where did Gooch get the idea that the statute of limitations begins to toll when a client has their

first meeting with a legal malpractice attorney?

- Does Gooch have a history using the same theory with other clients?
- Wouldn't Gooch already know that this claim puts Dulberg's attorney-client privileged communication with him at issue?
- Has Gooch put the attorney-client privileged communication of other clients at issue using the same theory?
- If so, why did he do it again?
- If not, why is this the first time in his career he encountered this situation?

Clinton-Williams were aware that Gooch set up Dulberg with the claim of "first knowing" of an "injury" during Dulberg's first meeting with Gooch on December 16, 2016. Clinton-Williams attributed the claim to Dulberg personally. This is how the game is played.

Clinton and Williams claimed: "*Thus, his communications with Mr. Gooch became relevant to the litigation.*"

Clinton and Williams state this in a way that gives the appearance this was Dulberg's fault. Gooch set Dulberg up on December 16, 2016. Years later both Clinton and opposing counsel Flynn use the original set-up as an alibi for their own respective claims and as a way to imply that Dulberg is to blame. This is true teamwork in action: Both of Dulberg's legal malpractice attorneys working seamlessly with opposing counsel Flynn (all effectively in agreement) to benefit Popovich and Mast at Dulberg's expense.

Clinton and Williams claimed: "*CLF was concerned about preserving confidentiality and work product privileges surrounding the strategies that were discussed prior to CLF's involvement in the case, and asserted those privileges on behalf of Mr. Dulberg during his deposition.*"

Dulberg's deposition was on February 19, 2020. Clinton and Williams resigned on July 27, 2020. Clinton and Williams did no discernible work related to Gooch emails from the day of Dulberg's deposition until resigning as counsel.

On July 29, 2020 at 1:56 PM, 2 days after Clinton and Williams sent a letter of resignation to Dulberg, Dulberg sent an email to Ed Clinton and Julia Williams with the subject "Need clarification on outstanding issues before your departure" stating:³⁷

"... Outstanding questions on open issues for Clinton firm before departure:

...

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? ..."

Williams answered:

"... There has been no motion practice on the issue and thus, there is no ruling. Your future counsel will need to bring that before the Judge at some point. ..."³⁸

37 [Exhibit 138_Need clarification on outstanding issues before your departure.pdf](#) (page 1)

38 [Exhibit 138_Need clarification on outstanding issues before your departure.pdf](#) (page 2)

Dulberg also asked:

“... 3. Similar to the last question, Have the objections in the Mast deposition been worked out or ruled on by judge Meyer? ...”

Williams answered:

“... There has been no motion practice on the issue and thus, there is no ruling. Your future counsel will need to bring that before the Judge at some point. ...”

They did no work on the issue and resigned, leaving their permanently disabled client to take care of it.

This once again demonstrates why it is not possible to understand what Clinton and Williams did to Dulberg without also understanding what Gooch and Walczyk did to Dulberg. Gooch and Walczyk provide cover for Clinton and Williams. Clinton and Williams provide cover for Gooch and Walczyk. They hide behind each other.

Clinton and Williams claimed: “*On August 18, 2020, CLF filed its motion to withdraw from the legal malpractice matter. On September 10, 2020, the court granted CLF’s motion to withdraw (Exhibit 6), and its representation of Mr. Dulberg reached a conclusion.*”

The first evidence³⁹ of withdrawal was on June 19, 2020 (6 days before the deposition of Hans Mast).

A draft withdrawal letter dated July 2, 2023 is in the electronic case file Clinton and Williams gave to Dulberg and Dulberg’s new attorney.

On July 10, 2020 Williams turned over more than 6000 newly bates-stamped documents to Dulberg and to opposing counsel.

The evidence demonstrates Clinton and Williams helped set up the ‘escape hatch’ for Popovich and Mast to be dismissed from the case and then Clinton and Williams resigned.

Clinton and Williams claimed: “*CLF chose to withdraw after reassessing the merits of Mr. Dulberg’s claim and the defenses raised by the defendants.*”

What Clinton calls “Mr Dulberg’s claim” is whatever they want to state Dulberg claimed, as is demonstrated in Tables 10 and 11. What Clinton calls “Mr Dulberg’s claim” is also listed in Tables 4A and 4B. None of the statements in Table 4A or Table 4B were made by Dulberg. They were all made by Gooch-Walczyk and Clinton-Williams. They were made to set Dulberg up. They are then called ‘claims’ of Dulberg.

What Clinton calls “Mr Dulberg’s claim” is also listed in Table 3. None of the 5 statements in Table 3 were made by Dulberg. All 5 statements were made by Dulberg’s legal malpractice attorneys. None of the 5 statements are accurate. They were made to set Dulberg up. Court records (12LA178 ROP from June 13, 2016 to August 10, 2016) unambiguously prove **who** placed an ‘upper cap’ on the value of 12LA178, **when** they did it and **where** they did it. This is

39 [‘ARDC Complaint Against Julia C. Williams and Edward X. Clinton’, starting paragraph 31 and Evidence of Fraud on the Court in 17LA377 During Clinton-Williams Representation paragraph 31 onward](#)

then blamed on Dulberg or ignored. They are then called ‘Dulberg’s claims’.

Dulberg’s actual claims to Williams and Clinton are documented in detail in [complete emails](#) and [email attachments](#) to Clinton and Williams. We give up attorney-client privilege over them to allow others to view what Dulberg actually told his attorneys and when.

The emails and attachments sent to Clinton and Williams and Gooch can also be compared to Tables 3, 4A and 4B. They demonstrate that:

- Dulberg’s attorneys ignored what Dulberg actually told them.
- Dulberg’s attorneys wrote whatever they wanted to write.
- Dulberg’s attorneys then attributed all these claims to Dulberg.

They did this to set Dulberg up.

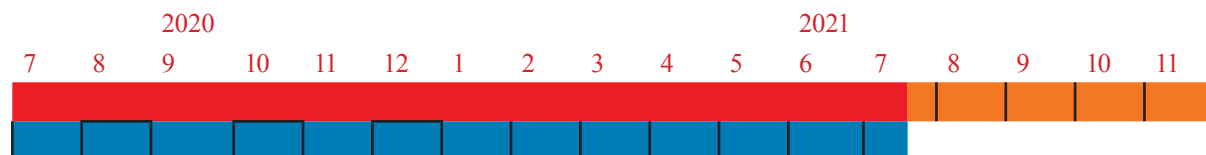
Table 10 and Table 11 both demonstrate the same pattern.

Clinton and Williams claimed: “*Shortly after CLF withdrew its appearance, Mr. Dulberg retained new counsel, Alphonse Talarico. (Exhibit 8) The case continued to be litigated for over a year.*”

Opposing counsel took full advantage⁴⁰ of the documents and information suppressed by Clinton-Williams (and by Gooch-Walczyk) during that time to:

- 1) Demand for detailed supplemental production responses (from the 2020-07-09 flood of over 6000 documents)
- 2) Demand to be given Dulberg’s privileged attorney-client communications with Gooch
- 3) Pressure Dulberg to admit receiving in the mail a partially forged declination letter from attorney Saul Ferris. (The letter was actually addressed to Flynn’s own client Popovich.

The following graphic shows over how many months these 3 forms of pressure were applied to Dulberg by Flynn as Clinton and Williams withdrew as Dulberg’s counsel.



The **demand for detailed supplemental discovery answers** (shown in red above) lasted until July 19, 2021 (about 12 months). The **demand for access to Dulberg’s attorney-client privileged communication** (shown in blue above) lasted until July, 2021 also (about 12 months). This is when **pressure for Dulberg to admit untrue statements about an alleged letter from Saul Ferris** (which was actually addressed to Popovich, shown in orange above) began and lasted for 4 more months.

⁴⁰ How opposing counsel maintained pressure on Dulberg is described in ‘ARDC Complaint Against Edward X. Clinton and Julia C. Williams’, Chapter 1 and Chapter 2, Section 2B THE EXAMPLE OF SAUL FERRIS and [Evidence of Fraud on the Court in 17LA377 During Clinton-Williams Representation](#) same sections and ‘ARDC Complaint Against Thomas W. Gooch and Sabina Walczyk’, paragraphs 155 to 171 and [Evidence of Fraud on the Court in 17LA377 During Gooch-Walczyk Representation](#) paragraphs 155 to 171

Pressure was applied to Dulberg as pro-se and to Dulberg's new attorney (since Clinton and Williams had already made secret plans to withdraw as Dulberg's counsel by late June, 2020).⁴¹ The 3 ways Dulberg was pressured are directly related to documents and information suppressed by Clinton-Williams. They set Dulberg up to be subject to all 3 forms of pressure.

Clinton and Williams claimed: "*On February 1, 2023, the court entered an order granting the defendants' motion for summary judgment, dismissing the case with prejudice. The court's order is attached as Exhibit 9.*"

In Table 6 Flynn's key accusations⁴² against Dulberg in his 2022 Summary Judgment are listed in Column 1. Column 2 shows how most every accusation made by Flynn against Dulberg in 2022 were set up and reinforced years earlier by Dulberg's own counsel (acting in collaboration with opposing counsel) to sabotage Dulberg's claims.

Dulberg's current attorney Mr Talerico is on the record since February 10, 2021 (Mr Talerico was retained on October 23, 2020) explaining the application of ***Suburban Real Estate v Carlson*** to Dulberg's case in order to claim that the statute is counted from December 12, 2016. Mr Talerico explained that Suburban Real Estate v Carlson makes clear that if Dulberg filed a legal malpractice suit against Popovich and Mast at any time before December 12, 2016 his filing would have been ruled premature. Mr Talerico explained Illinois law is clear that the first day that Dulberg had standing to file a legal malpractice suit against Popovich and Mast was December 12, 2016 and not one day sooner.

The arguments in ***Suburban Real Estate Servs. v. Carlson, 2020 Ill. App. 191953 (Ill. App. Ct. 2020)*** reference 5 other key cases:

Successful Appellant ***Suburban Real Estate*** relied on ***Lucey***⁴³ and ***Warnock***⁴⁴ (and ***Northern Illinois Emergency Physicians***⁴⁵)

Unsuccessful Appellee ***Carlson*** relied on ***FagelHaber***⁴⁶ and ***Nelson***⁴⁷ (and ***Goran***⁴⁸)

The notion of a "financial injury" on December 12, 2016 consistent with Illinois law in Suburban Real Estate v Carlson was never explained to Dulberg by Gooch, Clinton, or Williams, not even as a suggestion or possibility. Opposing counsel Flynn found no relevance in Suburban Real Estate v Carlson. It was not used or referenced in any of the 14 items in Table 5A and 5B. There is no notion of financial injury or application of Illinois law Suburban Real Estate v Carlson in any of the versions in Table 4A and 4B. Neither Judge Meyer or Judge Berg saw any relevance in Suburban Real Estate v Carlson and did not recognize any notion of a 'financial injury' occurring

41 'ARDC Complaint Against Julia C. Williams and Edward X. Clinton', Chapter 1, starting paragraph 31 and Chapter 2, Section 2E and

[Evidence of Fraud on the Court in 17LA377 During Clinton-Williams Representation](#) same sections

42 'ARDC Complaint Against Thomas W. Gooch and Sabina Walczyk'. page 69 and

[Evidence of Fraud on the Court in 17LA377 During Gooch-Walczyk Representation](#) page 69

43 *Lucey v. Law Offices of Pretzel & Stouffer, Chartered*, 301 Ill. App. 3d 349 (1998)

44 *Warnock v. Karm Winand & Patterson*, 376 Ill. App. 3d 364 (2007)

45 *Northern Illinois Emergency Physicians v. Landau, Omahana & Kopka, Ltd.*, 216 Ill. 2d 294, 306 (2005)

46 *Construction Systems, Inc. v. FagelHaber, LLC*, 2019 IL App (1st) 172430

47 *Nelson v. Padgitt*, 2016 IL App (1st) 160571

48 *Goran v. Gliberman*, 276 Ill. App. 3d 590, 595-96 (1995)

on December 12, 2016 consistent with Suburban Real Estate v Carlson in Dulberg's case.

Table 7 lists⁴⁹ statements of each of these 17LA377 Officers of the Court when applying Illinois case law to 17LA377. None of the statements in Table 7 made by Judge Meyer, Judge Berg, Defendants Popovich and Mast, Dulberg's former attorneys Gooch, Clinton and Williams reference or are based on any of the case law cited in in Suburban (which is current Illinois law applicable to Dulberg's case).

Clinton and Williams claimed: *"Upon information and belief, defendants raised, and ultimately prevailed, on the argument that Mr. Dulberg's legal malpractice claim was barred by the statute of limitations based upon when he knew or should have known of his alleged injury. (See Exhibit 10, Motion for Summary Judgment)"*

This means that Popovich and Mast successfully hid behind Dulberg's own legal malpractice attorneys. This was the plan from the first time Dulberg met Gooch on December 16, 2016. Tables 1, 2, 3, 4A, 4B, 5A, 5B, 6, 8, 9, 10 and 11 show how the game is played from start to finish. Comments made by Gooch to Dulberg and Thomas Kost (full trustee of the Paul R. Dulberg Revocable Trust) at Dulberg's first meeting with Gooch on December 16, 2016 directly set up Flynn's Summary Judgment arguments in 2022. This went according to plan. Gooch-Walczyk set Dulberg up and Clinton-Williams helped finish the job.

Clinton and Williams claimed: *"CLF is not aware of whether the privileges it asserted was maintained, waived, or addressed by the court subsequent to its withdrawal."*

Dulberg gives up all attorney-client privilege with Clinton-Williams and with Gooch-Walczyk. There is evidence that we had no secrets from the defendants anyway, since whatever we turned over to Gooch-Walczyk and Clinton-Williams was probably shared with opposing counsel by our own attorneys.

Clinton and Williams claimed: *"Mr. Dulberg has appealed the decision to the Second District Appellate Court. (Exhibit 11) That appeal is currently pending."*

The appeal currently pending serves as a demonstration of how centrally important the document and information suppression systems used by Gooch-Walczyk and Clinton-Williams against Dulberg are to the outcome of Dulberg's case. The systems of document and information suppression are central to the claims of Popovich and Mast as shown in Table 6.⁵⁰

The key evidence Tilschner v Spangler (Table 10, page 12) and Dulberg's claims of Popovich and Mast committing Intentional Tort and Fraud (Table 11, page 14) show how important the document and information suppression system that Clinton-Williams used against Dulberg is in Flynn's current arguments. It also shows how teamwork between Gooch-Walczyk and Clinton-Williams was essential to completely suppress key evidence for over 6 years.

Clinton and Williams claimed: *"CLF's withdrawal was accomplished without material adverse*

49 ARDC Complant Against Thomas W. Gooch and Sabina Walczyk page 84 and [Evidence of Fraud on the Court in 17LA377 During Gooch-Walczyk Representation](#) page 84

50 'ARDC Complaint Against Thomas W. Gooch and Sabina Walczyk' page 69 and [Evidence of Fraud on the Court in 17LA377 During Gooch-Walczyk Representation](#) page 69

effect on Mr. Dulberg and was consistent with Rule 1.16 of the IRPC.”

Clinton and Williams claimed: *“Mr. Dulberg’s request for investigation against Edward Clinton and Julia Williams lacks merit on its face and his charges are not supported by evidence.”*

All allegations are supported with evidence. We made specific claims of large scale systematic document and information suppression in Chapter 1 and showed, step by step, how it was done. Clinton’s response does not address any of it. They effectively ignored Chapter 1 of the complaint.

We made detailed claims of document and information suppression in collaboration with opposing counsel on at least 12 specific issues in Chapter 2, Sections A through L. Not one of the (at least) 12 specific issues raised in Chapter 2, Sections A through L was addressed or acknowledged by Clinton or Williams in their reply. They effectively ignored Sections 2A through 2L of the complaint.

After ignoring every specific point made in every specific claim in a 140 page complaint, respondents inexplicably state claims “are not supported by evidence”.

Thank you for your help with this matter and feel free to contact us if you need any additional information.

/s/ Paul Dulberg
Paul Dulberg

/s/ Thomas Kost
Thomas Kost

Full Trustee of the Paul R. Dulberg Revocable Trust