SUPPLEMENTAL INFORMATION SUBMITTED TO THE ARDC OF DULBERG'S EFFORTS TO NOTIFY THE ILLINOIS SUPREME COURT (THROUGH THE ARDC) AND PRESIDING JUDGES OF THE CLINTON-GOOCH-POPOVICH NETWORK OF FRAUD ON THE COURT SINCE FIRST DISCOVERING IT (IN OCTOBER, 2022)

Group Exhibit 49 contains the timeline of Dulberg's first discovery of Clinton-Gooch-Popovich fraud on court and of Dulberg's efforts over more than 1 year to notify presiding Judges and the Illinois Supreme Court (through the ARDC) of fraud on the court. Visual Aid 24 helps see how the timeline shows Dulberg's efforts over more than 1 year to notify the Illinois Supreme Court (through the ARDC) after first discovering the fraud.

The timeline provides detailed evidence of the following:

- Dulberg first discovered that Clinton and Williams suppressed large numbers of documents to benefit the opposing party between October 22 and October 28, 2022.
- Thomas Kost required about 90 pages of handwritten notes and around-the-clock effort over 6 days to "reverse engineer" and map the sophisticated system of document and information suppression that Clinton and Williams used against Dulberg.
- About one week later on November 4, 2022 Clinton and Williams appeared in court in 17LA377 to address a subpoena they were issued.
- On November 9, 2022 Dulberg sent a folder of documents called document_suppression_smoking_gun to Alphonse Talerico. The folder contained a detailed description of how documents were suppressed.
- The suppressed documents favor the defendants. Clinton-Williams were collaborating with opposing counsel to sabotage Dulberg's case (which is why the author used the term "smoking gun" to name the folder).
- Dulberg sent Alphonse Talerico drafts of an ARDC Complaint to file on Clinton and Williams less than 1 week later.
- The timeline demonstrates that Dulberg has made repeated efforts since November, 2022 to notify the ARDC and presiding Judges of the sophisticated system of document and information suppression that Clinton and Williams used against Dulberg.
- In December 8, 2022 Dulberg filed a complaint against the Baudins.

After the events listed above, the following events occurred:

- On February 1, 2023 defendants Popovich and Mast were dismissed from the case based on 2 year SoL argument. The Judge stated that Dulberg 'should have known or inquired' during the time Dulberg was represented by Popovich and Mast, Balke, and the Baudins.
- On May 25, 2023 defendants were dismissed from the case based on 2 year SoL argument. The Judge stated that Dulberg 'should have known or inquired' during the time Dulberg was represented by Clinton-Williams and Gooch-Walczyk.
- On August 29, 2023 the Baudin defendants were dismissed from the case based on 2 year SoL argument. The Judge stated that Dulberg 'should have known or inquired' during the time Dulberg was represented by Clinton-Williams and Gooch-Walczyk.
- When 17LA377 was appealed the issue of collaboration between Clinton-Williams and opposing counsel was never raised. We were told we could not raise the issue.
- We are also being told that if 17LA377 appeal is brought before the Supreme Court we will not be able to raise the issue of the 9 ARDC complaints we have filed about fraud on the mechanism of the court itself during 17LA377.

Group Exhibit 49 shows (document by document) the many ways that Dulberg tried to raise these issues since first discovering them in October, 2022. Despite these many efforts the issues were never raised before any presiding Judge. Throughout the timeline Dulberg was asking his attorney the questions shown in the table below:

REPORTING FRAUD WITNESSED DURING LITIGATION IN ILLINOIS COURTS (ACCORDING TO ILLINOIS PROTOCOL)

FOR CLIENT	FOR ATTORNEY
CASE 1: **How does client raise issue of fraud committed during litigation by opposing counsel?**	**CASE 1**: How does attorney raise issue of fraud committed during litigation by opposing counsel? 1) Follow Himmel Rule: Through ARDC (only authorized agent of Supreme Court) promptly
CASE 2: **How does client raise issue of fraud committed during litigation by ones own attorney or former attorney to sabotage case?**	**CASE 2**: How does attorney raise issue of fraud committed during litigation by client's former attorney to sabotage case? 1) Follow Himmel Rule: Through ARDC (only authorized agent of Supreme Court) promptly
CASE 3: **How does client raise issue of fraud of collusion during litigation between ones own atty and opposing counsel?**	**CASE 3**: How does attorney raise issue of fraud of collusion during litigation between client's former atty and opposing counsel? 1) Follow Himmel Rule: Through ARDC (only authorized agent of Supreme Court) promptly

We are not attorneys. We do not know how to answer the questions in red. It is clear that an Illinois attorney must follow the Himmel Rule in cases 1, 2 and 3. We have tried to raise these issues from November, 2022 to the present (as documented in the timeline). We were told we could not raise these issues to a presiding Judge and we are still being told we cannot raise these issues. Perhaps it is true.

It does not seem reasonable for us to be asked to endure fraud in the court that we know is happening as it happens and not inform any presiding Judge. I will cite 3 examples:

1) a high stakes poker game
2) children playing together
3) criminal rape

If during a high stakes poker game a person was caught cheating during a hand, the game would (most probably) be stopped immediately and the cheating would be dealt with before anything else. It is not sensible to ask those who were being cheated to finish the hand as if the cheating was not happening, and then to deal with the cheating at some later date.

Even groups of children playing a game tend to call out a cheater at the time the cheating is detected. They wouldn't allow a known cheater to gain significant advantage during a game and then "deal with it later", only after the game is won or lost.

As for rape, it is not possible for us to believe that the act should only be confronted after allowing the rapist time to finish the act of rape. ***Prompt intervention*** in an act of 'newly discovered' and ongoing rape is instinctive common sense and common decency.

The timeline shows that Dulberg has made repeated attempts to treat evidence of collusion with opposing attorney as a “front-burner” issue since first discovering it. The timeline shows that Dulberg’s attorney has treated evidence of collusion with opposing counsel as a “back-burner” issue. This is what the timeline shows month after month for around 15 months. Dulberg is constantly trying to place evidence of collusion with opposing counsel on the “front-burner” (and bring it to the attention of a Judge). Alphonse Talerico is constantly pushing it to a “back-burner” (and taking no interest in bringing evidence of collusion to the attention of a Judge).

We question this because of the examples of cheating in poker, or how children will call out a ‘cheater’ when caught, or the example of rape cited earlier. We have never understood why evidence of collaboration between Clinton-Williams and opposing counsel was repeatedly pushed to a “back-burner” by Dulberg’s own attorney for the last 15 months. We do not know if or when Alphonse Talerico filed his own ARDC complaints (so we do not know if he violated the Himmel rule). We have reason to believe that Alphonse Talerico only filed his own ARDC complaints sometime after September 28, 2023 (in response to seeing our website online) but we do not know for sure.

We are certain that we have never been given a legally coherent explanation as to why a presiding Judge should not be informed of evidence of collusion between opposing attorneys that strongly influences the case over which they are issuing orders. We are certain of this because the timeline does not have a single document which provides a legally coherent explanation. In fact, we couldn’t not find ***any explanation at all*** given to Dulberg in the whole timeline.

For the reasons stated above Dulberg is using an approach coined by Reagan and Gorbachev called “Trust but Verify”. Applying Reagan’s maxim here, Dulberg is providing an open detailed timeline (with supporting evidence) to both the ARDC and to the general public of:

(a) when and how Dulberg first learned of the Clinton-Williams system of document and information suppression and collaboration with opposing counsel to sabotage Dulberg’s case

(b) efforts Dulberg has made since then to notify presiding Judges and the proper authorities about the system of document and information suppression we discovered.

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

/s/ Paul Dulberg
Paul Dulberg

/s/ Thomas Kost
Thomas Kost
Full Trustee of the Paul R. Dulberg Revocable Trust