

From:

Paul Dulberg
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Dated: October 31, 2023

To:

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Members of the ARDC Committee,

We are submitting an ARDC Complaint against W. Randal Baudin II and Kelly N. Baudin.

We previously submitted the following ARDC Complaints:

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)

It is not possible to fully understand what the Baudins did to their client Dulberg without understanding how the Baudins were covering for Popovich and Mast and being covered by Gooch-Walczyk and Clinton-Williams. The legal malpractice attorneys Gooch-Walczyk and Clinton-Williams collaborated with opposing counsel to conceal from Dulberg wrongdoing the personal injury attorneys did to Dulberg. The Baudins covered for Popovich, Mast and Balke. Gooch then covered for Popovich, Mast, Balke, the Baudins. Clinton and Williams then covered for Popovich Mast, Balke, the Baudins, and Gooch-Walczyk.

The ARDC Complaints against Popovich and Mast describe how Popovich and Mast:¹

- Redirected medical lien liability from the Defendants to Plaintiff
- Forged documents and destroyed evidence
- 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)
- Knew Defendant Gagnon effectively admitted to negligence for Dulberg's injury

¹ All listed items are linked to supporting evidence on page 1 of "ARDC Complaint Against Thomas J. Popovich and Hans Mast"

- Knew Defendant Gagnon committed perjury
- Knew Defendant Carolyn McGuire committed perjury
- Committed settlement fraud
- Violated federal bankruptcy laws

The ARDC Complaint against Balke describes how:²

- Balke contracted with Dulberg and not with the Bankruptcy Trustee
- Balke told Dulberg (about 11 weeks later) he would withdraw counsel if Dulberg does not settle with Allstate for \$50,000
- Balke violated federal bankruptcy laws

The Baudins were retained by Dulberg after Dulberg fired Balke. The Baudins:³

- Contracted with Dulberg instead of with the Bankruptcy Trustee
- Moved to cap the value of PI case 12LA178
- Closed the deal with an upper cap of \$300,000
- 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 wants 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

Dulberg retained legal malpractice attorney Gooch-Walczyk. After firing Gooch Dulberg retained legal malpractice attorneys Clinton-Williams. It is not possible to fully understand what the Baudins did and how they got away with it without understanding that Baudins were covering for Popovich and Mast and being covered by legal malpractice attorneys Gooch-Walczyk and Clinton-Williams.

The ARDC Complaint against Clinton and Williams describe how Clinton and Williams:⁴

- Suppressed large numbers of documents

2 All listed items are linked to supporting evidence on page 1 of "ARDC Complaint Against Brad J. Balke"

3 All listed items are linked to supporting evidence on page 1 of "ARDC Complaint Against Kelly N. Baudin and William Randall Baudin II"

4 All listed items are linked to supporting evidence on page 1 of "ARDC Complaint against Edward X. Clinton and Julia C. Williams"

and how they collaborated with opposing counsel to benefit the defendants and sabotage Dulberg's case by:

- Concealing Dulberg's bankruptcy
- Suppressing emails from Saul Ferris
- Suppressing key evidence (Tilschner v Spangler certified slip ruling)
- Suppressing large numbers of emails from Brad Balke
- Collaborating with opposing attorney to flood Dulberg with over 6,000 documents just before withdrawing as Dulberg's counsel
- Suppressing all information on what the Baudins did to Dulberg
- Suppressing evidence that Defendant Gagnon effectively admitted negligence for Dulberg's injury as early as March, 2013
- Collaborating with opposing counsel to suppress Barch documents before Dulberg's deposition
- Collaborating with opposing counsel to weaken verification pages of discovery production
- Collaborating with opposing counsel during the deposition of Hans Mast and after

In addition, the ARDC Complaint against Gooch and Walczyk describe Gooch-Walczyk and Clinton-Williams:⁵

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

They did these things to protect the Baudins and other attorneys. One cannot fully understand what the Baudins did to Dulberg without understanding how the Baudins were protected by Dulberg's legal malpractice attorneys Gooch-Walczyk and Clinton-Williams.

All supporting exhibits are placed on 6 (64 GB) flash-drives that will be mailed to 130 E. Randolph Dr., Ste. 1500 Chicago, IL 60601-6219. Please advise to whom it should be addressed. One flash drive is intended for the ARDC and the other five are for the 5 attorneys mentioned in

5 All listed items are linked to supporting evidence on page 1 of "ARDC Complaint Against Thomas W. Gooch and Sabina Walczyk"

the complaints filed with this cover letter (should the ARDC find it necessary to provide them to the attorneys).

There are two sets of supporting exhibits. A second set is online (password protected) for ease of access. Each footnote within the ARDC Complaints hyperlinks online directly to the exhibit(s) cited. Please use any of the following:

User name: ardc1

Password: OQtHPqz3PqxO

User name: ardc2

Password: FrX-%Z#-Ddd^

User name: ardc3

Password: jR[]nA1(#Co4

If you need more user names and passwords please let us know.

/s/ Paul Dulberg

Paul Dulberg

/s/ Thomas Kost

Thomas Kost

Full Trustee of the Paul R. Dulberg Revocable Trust