

From: Paul Dulberg Paul_Dulberg@comcast.net 
Subject: No. 2023IN03135 _ Reply to Flynn's Response for Mast

Date: November 10, 2023 at 3:04 PM

To: srenfroe@iadc.org, vandrzejewski@iadc.org

Cc: Alphonse Talarico contact@lawofficeofalphonsetalarico.com, Tom Kost tkost999@gmail.com, srenfroe@iadc.org

PD

Dear Scott Renfroe,

This is our reply to Mr Flynn's response on behalf of his client Hans Mast.

Please find attached a PDF named:
2023-11-10_ARDC Reply to Flynn's Response for Mast.pdf

The attached PDF will require a username and password to access the links found in the footnotes throughout the document.
Please use the following:
Username: ardc4
Password: z{zzwyZ5L}Fc

If you need more usernames and passwords let us know and we will provide them.

Please feel free to contact me with any other information you may need and thank you for personally seeing to this matter.

Paul

Paul Dulberg
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2023-11-10_AR
DC Re...ast.pdf
[178 KB](#)

From:

Paul Dulberg
4606 Hayden Ct.
McHenry, IL. 60051

Dated: November 10, 2023

Re: ARDC No. 2023IN03135

To: Scott Renfroe
One Prudential Plaza
130 E. Randolph Dr., Ste. 1500
Chicago, IL 60601-6219
srenfroe@iadc.org

Dear Mr. Renfroe,

This reply is in response to Mr Flynn's October 27, 2023 letter.

ARDC Complaints were previously 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)

Dulberg is providing evidence that the accused attorneys act as a network. Dulberg's own legal malpractice attorneys protected Dulberg's personal injury attorneys from being discovered committing fraud. When Dulberg initiated a lawsuit against the PI attorneys, the defendants claimed that 2 years has already passed from the time Dulberg "first knew" of any "injury".

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 more than 2 years had passed since Dulberg "first knew" of any "injury".

This is why what Popovich and Mast did to Dulberg cannot be understood in its entirety without looking at what Gooch-Walczyk and Clinton-Williams 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

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 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)

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

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"

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

'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.

4 All listed items are linked to supporting evidence on page 1 of "ARDC Complaint against Edward X. Clinton and Julia C. Williams" (The listed items are Chapter 2, Sections A through K)

5 [Visual Aid 1](#) - Sources of bates order.png and paragraph 40 of "ARDC Complaint against Edward X. Clinton and Julia C. Williams"

6 [Visual Aid 10](#) - Duplicating long alphabetical list hoax.png and paragraph 48 of "ARDC Complaint against Edward X. Clinton and Julia C. Williams"

7 [Visual Aid 5](#) - Email hoax.png and paragraph 42 of "ARDC Complaint against Edward X. Clinton and Julia C. Williams"

- 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’.
- 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 hoax:¹⁰ 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 the massive suppression of documents and the hoaxes played on 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

8 [Visual Aid 6](#) - Lawyer Emails by date hoax.png and paragraph 42 of “ARDC Complaint against Edward X. Clinton and Julia C. Williams”

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”

10 [Visual Aid 3](#) - 377 document insertion hoax.png and paragraph 9 of “ARDC Complaint against Edward X. Clinton and Julia C. Williams”

- 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

- 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

Duhlberg hoax¹² shows a common ‘inside joke’ of mocking Dulberg as ‘Duh’-lberg that began with Popovich-Mast and was continued by Gooch-Walczyk and Clinton-Williams. A court reporter also shared the inside joke¹³ by mocking Dulberg.

What Gooch-Walczyk and Clinton-Williams did to Dulberg has to be looked at to fully understand what Popovich and Mast 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 were setting 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 hide 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 for the Defendants so the 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 be seen in a series of 9 tables.

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- 11 All listed items are linked to supporting evidence on page 1 of “ARDC Complaint Against Thomas W. Gooch and Sabina Walczyk”. (They are “TEAM-WORK” Examples 1 through 5)
- 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)
- 13 [Group Exhibit 42_17LA377 purchased by Dulberg/Reports of Proceedings_Folders-Year-Month-Day-Case_Original file names/2018-11-13_17LA377_Duhlberg/](#)

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 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’

14 ARDC Complaint Against Kelly N. Baudin and William Randall Baudin II, page 22

15 ARDC Complaint Against Thomas W. Gooch and Sabina Walczyk, page 3

16 ARDC Complaint Against Thomas W. Gooch and Sabina Walczyk, page 36

on the value of PI case 12LA178 about 3 weeks before bankruptcy trustee Olsen was appointed as bankruptcy trustee.

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.

In reply to ‘ARDC Complaint Against Thomas J. Popovich and Hans Mast’ Flynn attached his Summary Judgment Motion. Table 6 shows how key elements of Flynn’s Motion were set up years before by Dulberg’s own legal malpractice attorneys. Table 6 shows Dulberg was being set up to be accused of Flynn’s key claims 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

18 ARDC Complaint Against Thomas W. Gooch and Sabina Walczyk, page 42

19 ARDC Complaint Against Thomas W. Gooch and Sabina Walczyk from the first paragraph

20 ARDC Complaint Against Thomas W. Gooch and Sabina Walczyk, page 65

21 ARDC Complaint Against Thomas W. Gooch and Sabina Walczyk, page 67

22 ARDC Complaint Against Thomas W. Gooch and Sabina Walczyk, page 69

23 ARDC Complaint Against Thomas W. Gooch and Sabina Walczyk, page 84

24 ARDC Complaint against Edward X. Clinton and Julia C. Williams, 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

It is inappropriate for Flynn to represent Mast in the current ARDC complaint for the following reasons:

- Flynn was the opposing counsel in 17LA377 and directly participated in the large majority of acts of 'collaboration' or 'team-work' described in this letter and in 'ARDC Complaint

25 ARDC Complaint against Edward X. Clinton and Julia C. Williams, 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").

Against Thomas W. Gooch and Sabina Walczyk’ and in ‘ARDC Complaint against Edward X. Clinton and Julia C. Williams’.

- Evidence was given that Attorney Flynn collaborated with Dulberg’s legal malpractice attorneys Gooch-Walczyk and Clinton-Williams from December, 2016 to July, 2020. Dulberg’s legal malpractice attorneys worked against Dulberg to destroy his case.
- To our knowledge Mr Flynn is listed as a person of interest in at least 2 and possibly 3 investigations being conducted by the Illinois Judicial Inquiry Board concerning the close personal relationship that exists between Judge Thomas Meyer and Thomas Popovich (Mr Flynn’s other co-client to Mast) and the contrasting selective Judicial Recusal’s and non-recusal’s found in multiple cases including (but not limited to) 12LA178, 12LA326, 17LA377 and 18LA370 in the 22nd Judicial Circuit Law Division.

In addition to the acts of collaboration with opposing counsel cited in this reply letter, Mr Urbanski (a certified short hand reporter and owner of Urbanski Reporting) forwarded Dulberg’s contact information to a “Carrie Vahl”. Dulberg was contacted by someone named “Carrie Vahl” of Vahl Reporting Services and offered 5 deposition certification pages which appear to be forgeries. We do not believe that the person who claimed to be ‘Carrie Vahl’ was actually her (if Carrie Vahl even exists).³¹ It is more likely than not that “Carrie Vahl” is actually an agent working on behalf of Mr Popovich and Mr Urbanski or is Mr Popovich or Mr Urbanski themselves. Flynn was and is opposing counsel and an agent of Popovich. The events suggest the opposing party most probably (1) offered documents to us which are most probably forgeries (as detailed by Omni Document Experts)³² and (2) impersonated a court reporter named ‘Carrie Vahl’ conducting business with a client.

Mr Flynn (in case 18LA370) filed with the Circuit Clerk “DEFENDANTS THE LAW OFFICES OF THOMAS J. POPOVICH, P.C. AND THOMAS J. POPOVICH’S MOTION/ MEMORANDUM IN SUPPORT OF THEIR MOTION FOR SUMMARY JUDGMENT”. Attached to the memorandum as Exhibit 6, Mr Flynn included Mr Popovich’s deposition recorded personally by Michael Urbanski. In his deposition on page 69 lines 10-11 Mr Popovich stated “I trust Mr. Urbanski implicitly, explicitly, in all ways”. Since it was Michael Urbanski that connected us to “Carrie Vahl”, this strongly suggests that Michael Urbanski has a close personal relationship with Mr Popovich and in no way can be considered a neutral party in any court proceeding involving Popovich.

17LA377 is currently under appeal. Flynn continues to use the same arguments in the appeal and use the same techniques described in this letter. The fraud continues to move through the appeal process as if the fraud does not exist. In this sense the appeal process continues to effectively justify and reward the fraud.

Classical definition of “gaslight” (Cambridge Dictionary):

“to trick or control someone by making them believe that their memories or beliefs about something are wrong, especially by suggesting that they may be mentally ill”

31 [Group Exhibit 10-2022-03-30_Carrie Vahl communication/](#)

32 [Group Exhibit 6-Margaret Orton signatures analyzed/](#)

It is difficult to find a better word to describe how Popovich, Mast, Balke, the Baudins, Gooch, Walczyk, Clinton and Williams treated their permanently disabled client Dulberg and continue to treat Dulberg to this day.

/s/ Paul Dulberg

Paul Dulberg

/s/ Thomas Kost

Thomas Kost

Full Trustee of the Paul R. Dulberg Revocable Trust