

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

PAUL R. DULBERG, INDIVIDUALLY AND)
THE PAUL R. DULBERG REVOCABLE)
TRUST)

Plaintiffs,)

vs.)

KELLY N. BAUDIN A/K/A BAUDIN &)
BAUDIN, BAUDIN & BAUDIN AN)
ASSOCIATION OF ATTORNEYS, LAW)
OFFICES OF BAUDIN & BAUDIN,)
BAUDIN & BAUDIN LAW OFFICES,)
WILLIAM RANDAL BAUDIN II A/K/A)
BAUDIN & BAUDIN, BAUDIN & BAUDIN)
AN ASSOCIATION OF ATTORNEYS, LAW)
OFFICES OF BAUDIN & BAUDIN,)
BAUDIN & BAUDIN LAW OFFICES,)
KELRAN, INC A/K/A THE BAUDIN LAW)
GROUP, Ltd., JOSEPH DAVID OLSEN,)
A/K/A YALDEN, OLSEN & WILLETTE)
LAW OFFICES, CRAIG A WILLETTE,)
A/K/A YALDEN, OLSEN & WILLETTE)
LAW OFFICES, RAPHAEL E YALDEN II,)
A/K/A YALDEN, OLSEN & WILLETTE)
LAW OFFICES, ADR SYSTEMS OF)
AMERICA, LLC., ASSUMED NAME ADR)
COMMERCIAL SERVICES, ALLSTATE)
PROPERTY AND CASULTY INSURANCE)
COMPANY)

Defendants.

CASE NO. 2022L010905

**ALPHONSE A. TALARICO'S RESPONSE TO PLAINTIFF DULBER AND KOST'S
MOTION TO RECONSIDER APRIL 22, 2025 FINAL ORDER BASED ON MISTAKES
IN LAW**

NOW COMES the Respondent Alphonse A. Talarico attorney at law and licensed to practice in this Court, sanctioned under rule 137, jointly and severally with Movants herein Dulberg and Kost as Trustee of the Paul R. Dulberg Revocable Trust states as follows:

PREAMBLE: I agree with Movants that the Honorable Judge Swanagan order of April 22, 2025 should be modified, but with the different outcome that Movants remain jointly and severally liable for the amount of the rule 137 sanctions but, for the reasons that follow, attorney Alphonse A. Talarico be found not liable because he was specifically ordered to file Movants' Complaint at Law 2020 L 010905 with the statute of limitation expiring within hours.

Regarding Movants' mistaken interpretation of the facts and their repeated and continued claim of Alphonse A. Talarico lying to this Honorable Court and the Attorney Registration and Disciplinary Commission Talarico unequivocally denies the false allegation and demands Movants' strict proof thereof.

Finally, after working with, representing and defending against allegations of the Movants herein, I have come to the conclusion, as an attorney, not as a medical diagnosis, that the Movants' are not lying but see the Law, Lawyers, Judges, Court Personnel through the filter of Persecutory Delusions.

Example1. Dulberg is NOT a “Disabled Individual under Federal or Illinois law.

Dulberg’s repeated and continual claims of “Disability” are viewed by Respondent not as a lie or a subliminal request for special treatment but as a clear showing of Persecutory Delusion as Dulberg’s Disability legal determination, after much litigation and appeal ended on April 23, 2013. Respondent raises this issue and those that follow to spotlight Dulberg’s credibility. (Please see Exhibit R1 which is redacted page 9 of an 814 page report, the full report can be submitted to the Honorable Court in camera if requested to do so.)

Example2. Every lawyer, judge, court administrator, court employee, reporter etc. is conspiring to harm Dulberg and Kost. The following are ten (10) redacted examples of Complaints that Movants have filed against attorneys:

No.2023JN02517 (submitted on July 27, 2023)

No.2023IN02518 (submitted on July 27, 2023)

[REDACTED] No. 2023IN03135 (submitted on September 15, 2023)

[REDACTED] No. 2023IN03136 (submitted on September 15, 2023)

[REDACTED] N 2023IN03894-R (submitted on November 8, 2023)

No. 2023IN03898-R (submitted on November 8, 2023)

No. 2023IN03897-R (submitted on November 8, 2023)

No.2023IN03895-R (submitted on November 8, 2023)

No. 2023IN03896-R (submitted on November 8, 2023)

Alphonse A Talarico No.2024 IN 00264 (submitted on March 15, 2024 and concluded on January 14, 2025 please see Exhibit R2 and R3 attached)

(Please see Exhibit R4 an email from Dulberg and Kost to the ARDC substantiating the above 10 Complaints filed by the movants herein)

Appellate Court Judge Susan F. Hutchinson with the Judiciary Inquiry Board. (Please see Exhibit R5 attached)

Retired Judge Thomas A. Meyer, now an independent contractor for Alternative Dispute Resolution, a party herein (Please see Movants' Motion To Reconsider)

Thomas Long, Respondent's former attorney herein based upon Long's employment with a Law Firm that represented a client who was married to an attorney Dulberg filed an ARDC Complaint against and based upon that alone the Movants' now alleged Tom Long to be in a conspiracy with all of the above to harm Dulberg and Kost. (Please see Movants' Motion To Reconsider and Exhibit R6 attached.)

Note: Investigation Continues

2a. Another example of the high regard the Movants' hold the legal profession and maybe with the thought that the ARDC and their investigators were also a part of the conspiracy against the Movants is their allegations that Alphonse A. Talarico continually lied to the ARDC investigators over the 6 month investigation and deceived them regarding the thousands of documents submitted by both sides in that the ARDC decided no further investigation was warranted. The natural conclusion is that the teams of

investigators were either fools or they also were part of the conspiracy against the Movants.

3. Movants claim that Alphonse A. Talarico drafted the portion of the Complaint against Alternative Dispute Resolution without their input or knowledge, and therefore they should be exonerated from any blame and liability.

The following exhibits will prove that these allegations are false:

3a. Respondent's Exhibit R7 (attached) is an email from Movants to Alphonse A. Talarico titled A smoking gun that Dulberg never signed the agreement and who may have stating that the signed ARD agreement was not signed by Dulberg.

3b. Respondent's Exhibit R8 (attached) is an email from Movant Dulberg to respondent Talarico showing differences in the terms of the Bankruptcy Judge's approved agreement and the one that was used at the binding mediation that Movant Dulberg claims he did not sign.

3c. Respondent's Exhibit R9 (attached) is an email from Movant Dulberg with the opening paragraph is an instruction to Respondent stating "It is time to get the ball rolling on the fraudulent ADR contract" and on the second page stating 3. ADR a. Acceptance of an obviously flawed contract that is differeny than the contract originally authoted by ADR. B.Failure to follow and enforce the terms/rules written in the contract about modification to the contract. I Movant Dulberg) believe all3 defendants could be charged with conspiracy to commit fraud against the bankruptcy estate as well. Thanks, Paul

3d. Respondent's Exhibit R10 (attached) is the verification and Rule 222(b) affidavit signed by Movant Dulberg. Under Illinois Supreme Court Rule 137, it is not a valid defense to sanctions that a plaintiff signed a complaint without reading it. Rule 137 explicitly requires that the signature of an attorney or party on a pleading, motion, or other document certifies that the signer has read the document, conducted a reasonable inquiry into its basis, and believes it is well-grounded in fact, warranted by existing law, or supported by a good-faith argument for the extension, modification, or reversal of existing law. The rule further mandates that the document must not be filed for any improper purpose, such as harassment or causing unnecessary delay or expense Medical Alliances, LLC v. Health Care Serv. Corp., 371 Ill. App. 3d 755, Ill. Sup. Ct., R 137.

Summary: Respondent attorney Alphonse was under a compulsion to file and thereafter litigate this matter regarding the constraints and instructions of Movants based upon the immediate (within 24-48 hours) expiration of a statute of limitation expiring, the implied treats of ARDC reporting by Movants of the violated statute of limitations and other personal reasons.

Furthermore Respondent's failure to amend the Complaint regarding the section against the Alternative Dispute Resolution was caused by the former Judge Otto stating that he thought that he had released the Alternative Dispute Resolution and since there was no representative for Alternative Dispute Resolution in court nor did anyone correct the record when the order was circulated, Respondent approached this issue as one that had to be Appealed.

Further Responding, attorney Alphonse A. Talarico does not request or demand a hearing on this motion, but welcomes the opportunity to be heard in open Court if the Honorable Judge Swanagan so determines.

WHEREFORE, Respondent attorney Alphonse A. Talarico prays the Honorable Judge Swanagan revise his order of rule 137 sanctions to apply to Movants herein jointly and severally, and to find Respondent Alphonse A. Talarico free from liability for sanctions.

/s/ Alphonse A. Talarico

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