

Date : 1/30/2021 1:51:42 PM

From : "Paul Dulberg"

To : "Law Office Of Alphonse Talarico"

BCc : "Paul Dulberg"

Subject : Re: Report of proceedings May 10 2018 filed January 25 2021

Hello Mr Talarico,

I'm going to need a bit of time to digest SUBURBAN REAL ESTATE SERVICES, INC., and BRYAN BARUS v. WILLIAM ROGER CARLSON JR. and CARLSON PARTNERS, LTD. After a quick first read, it seems as if the arguments made are almost identical to the facts I raise and the flawed arguments the defense raises.

Just wanted to let you know I found the case you referred me to and I am going to study it more closely.

Nice find!

Thank you,
Paul

On Jan 30, 2021, at 11:29 AM, Alphonse Talarico
<contact@lawofficeofalphonsetalarico.com> wrote:

Dear Mr. Dulberg,

This recent filing by Defendants brings to light another factor I did not know.

First, although the order from the date drafter by the Gooch firm correctly states that the 2-619 motion was denied, it does not indicate the road map the judge laid out to bring the 2-619 motion again and that a motion for summary judgment might be appropriate at a later date. Furthermore, the question of estoppel was left open also.

The order should have indicated such by saying denied without prejudice...

I have attached the report of proceedings for your comment.

This with the Clinton's firm failure to respond (and maybe an improper prior response) to Defendants' affirmative defenses paints an interesting picture of your case.

Sincerely,
Alphonse A. Talarico Esq.

<Recorded proceedings May 10, 2018 filed by defendants January 25 2021 CC-Civil - 17LA000377 - 1_25_2021 - - - REOP - -.pdf>