

Date : 4/15/2021 4:02:17 PM
From : "Paul Dulberg"
To : "Law Office Of Alphonse Talarico"
Subject : Re: 17 LA 377

Dear Mr Talarico,

Thank you for understanding that during recovery from surgery I may be a bit out of it and yes I agree it is best to get as much done before the surgery as possible including paying you your fee.

Tomorrow morning I will mail another \$4,000 to you as a start.

After that I can send whatever amount you specify you need for the time I am recovering from surgery.

I would like to keep it in \$4,000 increments just because it makes my accounting simple and is small enough so that there shouldn't be any bank delays when you cash the checks.

If I can be of any assistance helping you to identify or understand any of those 8,707 documents or the interrogatories please let me know.

Thank you again for all your hard work,
Paul

Paul Dulberg
4606 Hayden Ct
McHenry IL 60051

Phone: 847-497-4250

On Apr 15, 2021, at 2:16 PM, Alphonse Talarico
<contact@lawofficeofalphonsetalarico.com> wrote:

Dear Mr. Dulberg,
Thank you for the update on your availability on your time to give me your insight into the many events that you have experienced since you were injured by Gagnon/McGuire and a string of prior attorneys.

I have been, am and will be working most of my working/waking hours on your case exclusively based on the Judge's order on April 1, 2021 and how the Clintons responded/represented to discovery on your case.

Since you rightfully need to recuperate from additional surgery, and you indicate a mental exhaustion from the stress of your case I want to raise the issue of fees now rather than in early May.

Please consider what you can pay now for the many hours past , present and immediate future (most of which may now be offset by what you won't have to pay to the Clintons and call or write me to indicate the payment you will send .

Your anticipated cooperation is greatly appreciated,
Alphonse A. Talarico, Esq.

□

From: Paul Dulberg <pdulberg@comcast.net>

Sent: Friday, April 9, 2021 8:21 AM

To: Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>

Subject: Fwd: 17 LA 377

Dear Mr Talarico,

I wanted to touch base today and update you on a couple items.

1. Below is the ongoing email conversation with the person assigned to make the transcript from the last court hearing.

It appears I am waiting for them to finish the transcript and get a final invoice before paying.
I am hoping to hear back from them soon on this.

2. My second surgery for removing the tumor has been scheduled for May 10th, 2021

As you know from last time, the two week recovery takes it to May 24th, 2021 and from what I experienced after the previous surgery the surgeon gave a very conservative time frame for recovery.

In reality it took me somewhere between 3-4 weeks before I was feeling well enough both physically and mentally to do anything substantial.

Just taking with you on the phone during the recovery period last time was like torture so I need a little time on this one.

Also, the week prior to the surgery is already filling up with all the pre-operative tests that need to be done. I am still waiting for the exact dates of a few of them.

In total I believe this all means approximately 5 weeks where I will not be in any position to help you or anyone else with much of anything.

This puts the total time I need away from the case from May 3rd through June 7th, 2021.

If we need anything from me or done by me I suggest we either complete it before May 3rd, 2021 or ask the judge now for a 5 week time extension.

I am sure opposing counsel will oppose and complain about the time extension but this surgery may be a little more extensive than the last and I will be unavailable for the full 5 weeks.

I have had no breaks from the underlying case nor this case since June 28th 2011 and my health needs this break irregardless of opposing counsels meaningless arguments.

I feel strongly about this 5 weeks and if the judge takes an issue with a medical timeout of 5 weeks

Due to a major medical condition that must be addressed now then he can find me in contempt and put me in the county jail and they can pay for my medical while I am in their custody recuperating.

Either way I will be unavailable from May 3rd through June 7th, 2021.

How are you doing with the 8000+ pages and should I be looking at the interrogatories and supplementing the answers?

Thank you,

Paul

Begin forwarded message:

From: Paul Dulberg <pdulberg@comcast.net>
Subject: Re: 17 LA 377
Date: April 5, 2021 at 11:46:22 AM CDT
To: Stacey Collins <SACollins@22ndcircuit.illinoiscourts.gov>

I am agreeable

On Apr 5, 2021, at 11:09 AM, Stacey Collins
<SACollins@22ndcircuit.illinoiscourts.gov> wrote:

Mr. Dulberg,

If you are agreeable, I would be willing to invoice you at the completion of the transcript. There will be less fees involved on my end if you are intending to pay via ACH if I invoice you only one time.

From: Paul Dulberg [<mailto:pdulberg@comcast.net>]
Sent: Monday, April 5, 2021 10:47 AM
To: Stacey Collins <SACollins@22ndcircuit.illinoiscourts.gov>
Subject: [EXTERNAL] Re: 17 LA 377

Dear Stacy Collins,

Sorry I didn't realize it was a holiday last Friday until after I sent that email.

Please send an invoice that allows me to pay via bank ACH so you have the necessary deposit to start work the transcript.

Thank you,
Paul

Paul Dulberg
847-497-4250
4606 Hayden Ct.
McHenry, IL 60051

On Apr 5, 2021, at 8:47 AM, Stacey Collins
<SACollins@22ndcircuit.illinoiscourts.gov>
wrote:

send you an invoice that allows you to pay via
bank ACH

minated from outside of the County network. Do not click links or open attachments unless you recognize the sender and the actual SENDER field and the FROM field are common. It is also a common spoofing tactic. For additional reference, see the email from pdulberg@comcast.net

If you have any questions about the legitimacy of this email, please call the helpdesk at extension 4828.