

**Date : 9/4/2021 5:43:57 AM**  
**From : "Paul Dulberg"**  
**To : "Law Office Of Alphonse Talarico"**  
**BCc : "Paul Dulberg"**  
**Subject : Re: Dulberg v. Popovich**

Dear Mr Talarico,

I am curious if we can subpoena Saul Ferris for the original letter, all emails and the certified US mail receipt that was signed for at the Popovich Firm today before the motion is heard in court?

The 3 emails below should be enough for the Judge to allow us time to discover the truth behind the Saul Ferris letter and if its genuine before deciding on the Motion:

On Mar 6, 2015, at 2:40 PM,  
Saul Ferris <[saulferris1@gmail.com](mailto:saulferris1@gmail.com)> wrote:

Hi Paul

I decided not to accept your case primarily based upon you settling with the homeowners for 5 thousand. **I have mailed your file back to you.** I would suggest attending the pretrial to at least see what kind of settlement offer is made. Thanks for letting me review your case. Sorry I can't help you. Best, Saul  
(Dulberg 002785)

From: Paul Dulberg  
Sent: Friday, March 20, 2015 3:49 PM  
To: [brad@balkelaw.com](mailto:brad@balkelaw.com)  
Subject: Missing Depositions and pre-trial settlement brief  
Hi Brad,

As we discussed, I was to receive via certified US Mail depositions and communications between Hans Mast and myself from Saul Ferris an attorney in Gurnee, IL. Saul Ferris number is (847) 263-7770

I called Saul Ferris office last week and was assured they were sent. I was told to give it another week.

**I called Saul Ferris office again today to find out they were mailed to and signed for at 3416 W. Elm St. McHenry, IL. by someone named Anne Oupl on March 7th. This is Hans Mast office.**

I called Hans office and apparently no one by that name works there and no one knows anything about receiving the certified mail.

I'm at a loss as to how these documents were sent to the wrong place and am a bit furious because it has the memo about the pre-trial settlement you wanted to see.

Please advise.

Thank you in advance for your help with this matter, Paul  
Paul Dulberg 847-497-4250 Sent from my iPad  
(Dulberg 001334)

From: Paul Dulberg [<mailto:pdulberg@comcast.net>] Sent: Friday, **May 08, 2015** 12:34 PM

To: <[brad@balkelaw.com](mailto:brad@balkelaw.com)>

Subject: Missing memo for pretrial settlement

Hi Brad,

**Yesterday Saul Ferris office called and said they just received back the packet they mistakenly sent to Hans Mast at Popovich law firm.**

In it is the pretrial settlement memo you wanted to see.

There is also the printed depositions of both the homeowners, the defendant and myself.

**I picked these up this morning.**

Let me know how to get these to you.

Thank you, Paul

Paul Dulberg 847-497-4250 Sent from my iPad

(Dulberg 002639)

Subpoena of Saul Ferris records would go a long way to Answer the questions;

1. Is the letter Dulberg received actually from Saul Ferris and are the two letters identical?
2. Did the Popovich Firm have possession of the letter from March 7, 2015 till early May of 2015?

If we do subpoena the letter and records from Saul Ferris now, would the court allow for a continuance until the letter is obtained and a deposition of Saul Ferris and possibly Barbara Dulberg (Barb is a witness who was present at the Saul Ferris free consultation) is completed?

Since the Saul Ferris letter is at this point a question of Fact and Dulberg is challenging the dates on the letter, shouldn't all questions of Fact be decided by the Jury?

Would you agree we should update our discovery responses to include both the 222(b) affidavit and the altered Rx Receipts in a way that lets the Judge see them so they both are fresh in his mind while he decides on the Saul Ferris letter, it's genuineness as fact and the possibility that this letter was at the Popovich Firm for 2 months and may have been altered?

I believe showing other provable, factual altered documents from the Popovich Firm will go a long way when the Judge decides if the Saul Ferris letter is genuine or not.

Thank you,  
Paul

On Sep 3, 2021, at 2:36 PM, Alphonse Talarico  
<[contact@lawofficeofalphonsetalarico.com](mailto:contact@lawofficeofalphonsetalarico.com)> wrote:

Dear Mr. Dulberg,

Please see the attached documents

Thanks

Alphonse

<Response to Defendant Motion To Deem facts Admitted (Filed).pdf><Notice of Filing Response to Defendants Motion to Deem Facts Admitted (Filed).pdf>