

Date : 1/13/2022 9:37:07 AM
From : "Paul Dulberg"
To : "Law Office Of Alphonse Talarico"
BCc : "Paul Dulberg"
Subject : Re: 5 pillars increased to 6 pillars and subpoenas required

I should add to the below that I remember Judge Meyer said to me in effect at the pretrial settlement conference in the Jury room that Mr Accardo was offering everything I requested, which was \$50,000.

I don't know if the pretrial settlement conference shows up in the transcripts/report of proceedings that we just ordered but if those negotiations are transcribed we will have them early next week.

Thank You,
Paul

> On Jan 13, 2022, at 9:18 AM, Paul Dulberg <Paul_Dulberg@comcast.net> wrote:

>

> Also, another attempt to subpoena the bankruptcy trustee Heeg's documents and communications with the Popovich firm is also needed.

>

> This is needed because the Popovich Firm knew of the bankruptcy and never informed the local court of it and pushed through the pretrial settlement conference after the fact without withdrawing or resigning on to the case. This was clear and obvious attempt to cover themselves in the local court after they should have informed the Judge of the bankruptcy. If Popovich were not covering for the \$50,000 222b affidavit, at this point they would have motioned the court for leave to amend the 222b affidavit long before this time.

>

> I promise this is the last subpoena I will ask for today.

>

> These subpoenas are absolutely necessary to seal up all holes the defense may try to use.

>

> Thank You,

> Paul

>

>> On Jan 13, 2022, at 8:57 AM, Paul Dulberg <Paul_Dulberg@comcast.net> wrote:

>>

>> Okay, There is another hole I would like to seal.

>>

>> How do I get from Attorney Balke his communication between Mr Balke and myself and between Mr Balke and anyone at the Popovich firm.

>>

>> Also, how do I go about getting answers from Mr Balke about his receiving and inventory of the case file (Mixed Brown Box File) from the Popovich Firm.

>>

>>

>> On another note:

>> The Saul Ferris letter was not the only document that was forged by the Popovich Firm.

>>

>> The pretrial settlement conference memo was changed from \$50,000 to \$135,000.

>>

>> The emails between Mast and I over the pretrial settlement memo in early 2015 clearly show that Mast was representing a \$100,000 limit on the Allstate insurance yet the memo asks for \$135,000 after it was sent back to the Popovich office then back to Saul Ferris.

>>

>> There is no copy of the settlement Memo with the \$50,000 as Saul Ferris was given the only copy I had that was mailed to me by Mast. This Memo went via US Postal Certified mail to The Popovich Firm In March 2015, Sat in

Popovich's possession for 2 months then was returned to Saul Ferris in may of 2015 and then given back to me this time reading \$135,000 which is more than Mast said the entire Allstate policy was worth.

>>

>> I have a funny feeling the original Memo saying \$50,000 may show up in Mr Accardo's records as that is the exact and only amount he offered at the pretrial settlement conference.

>>

>> What ever you need to do to get the records from Balke, The US Post office or Mr Accardo I will gladly pay for.

>>

>> Thank You,

>> Paul

>>

>>

>>> On Jan 13, 2022, at 8:24 AM, Paul Dulberg <Paul_Dulberg@comcast.net> wrote:

>>>

>>> There is 2 more subpoenas that we should demand now.

>>>

>>> All communications between Mr Flynn and the Clinton firm.

>>>

>>> I need 2 subpoenas, one to go to the Clinton firm and the other to go to Mr Flynn's firm.

>>>

>>> I think the reason for this is obvious.

>>>

>>> Thank You,

>>> Paul

>>>

>>>> On Jan 13, 2022, at 8:16 AM, Paul Dulberg <Paul_Dulberg@comcast.net> wrote:

>>>>

>>>> Dear Mr Talarico,

>>>>

>>>> I need 2 subpoenas asap. I will pay for these as soon as you need the money to do these 2 subpoenas.

>>>>

>>>> The first is the US post office for the certified mail receipts between Saul Ferris office address and the Popovich office address for the months of March, April and May of 2015.

>>>>

>>>> The second is of all documents, communications, notes, emails, letters, etc... between anyone at the Popovich firm and Mr Accardo who represented Allstate insurance on behalf of David Gagnon in the underlying suit 12LA178.

>>>>

>>>> The Clintons did subpoena attorney Accardo and from my understanding was not responded to I need this done again.

>>>>

>>>>

>>>> On another note, attached is still a work in progress but is much improved from what I sent you on 1/10/2022.

>>>>

>>>> Please take a look and you can see why I need those subpoenas to strengthen a couple of the 6 pillars.

>>>>

>>>> I should have a finalized version of this by next Monday.

>>>>

>>>>

>>>> Just a reminder, I need those subpoenas issued.

>>>>

>>>> Thank You,

>>>> Paul

>>>>

>>>> <6_pillars.pdf>

>>>>

>>>>

>>>>

>>>>

>>>>> On Jan 10, 2022, at 9:14 AM, Paul Dulberg <Paul_Dulberg@comcast.net> wrote:

>>>>>

>>>>> Dear Mr Talarico,

>>>>>

>>>>> The attached is a work in progress and is not finished but I wanted to share it before we proceed with the RFA's, 10 Interrogatories and 10 Production requests.

>>>>>

>>>>> Thank you,

>>>>> Paul

>>>>>

>>>>>

>>>>> <5_pillars.pdf>

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