

Date : 1/24/2022 8:27:23 AM

From : "Alphonse Talarico"

To : "Paul Dulberg"

Subject : Re: Dulberg vs. Gagon,et al McHerny County Case-ExpertWitness

Dear Mr. Dulberg,

It is correct.

Thank you,
Alphonse A. Talarico

On Monday, January 24, 2022, 07:23:40 AM CST, Paul Dulberg <paul_dulberg@comcast.net> wrote:

Dear Mr Talarico,

Please confirm the information below for the 2 checks being issued is correct:

First check:

Amount:
\$1,200.00

Payable to:
Alphonse Talarico

Memo:
17LA377 - Jury Verdicts (Illinois)

Mail to:
The Law Office of ALPHONSE A. TALARICO
707 Skokie Boulevard #600,
Northbrook, Illinois 60062

Second Check:

Amount:
\$7,200.00

Payable to:
Alan Kravets

Memo:
17LA377 - Consulting Expert

Certified Mail to:
Alan Kravets,Esq
1340 N Astor St.
Suite 2803
Chicago, Illinois 60610

Thank you,
Paul

On Jan 21, 2022, at 3:11 PM, Alphonse Talarico <alphonsetalarico@yahoo.com> wrote:

Dear Mr. Dulberg,

Please have a check for \$7,200.00 forwarded to Mr. Kravets for his consulting expert retainer and a check to me for \$1,200.00 for Jury Verdicts (Illinois) contract.

Thank you,
Alphonse A. Talarico

----- Forwarded Message -----

From: Alan Kravets <alan@kravets.net>

To: alphonsetalarico@yahoo.com <alphonsetalarico@yahoo.com>

Sent: Tuesday, January 18, 2022, 01:58:40 PM CST

Subject: Dulberg vs. Gagon, et al McHenry County Case-ExpertWitness

Dear Mr. Talarico;

You have seen some information about myself in the form of a Resume/ CV that was published through a link on the ALM website.

After reviewing your description of the unusually complicated facts in this case, I suggest I would initially act as your Consultant in this case. My compensation would be at the rate of \$450.00 an hour including time spent in preparation for depositions, or Court appearances, preparing any written reports, if needed, giving depositions and testifying in Court. In addition, reasonable travel expenses, in this case only mileage (using published IRS cost per mile) in excess of 60 miles from downtown Chicago, reasonable copying costs from a third party copying center, delivery charges such as UPS or Fed Ex, and any other costs

approved by you in advance, would also be reimbursed. I will require a retainer of \$7,200 and use it for the first 16 hours of work and costs if needed, and will bill monthly thereafter. Any unused time will be refunded.

Within the last few years , I have been engaged to testify as an expert at trial or by deposition in the following cases;

- Cook County ,Il Law Division--in defense of a national brokerage firm and their salesperson ,
- Cook County, Il Law Division--against a licensed Illinois Attorney for malpractice,
- Hennepin County (Minneapolis) Mn --against an industrial/commercial broker for malpractice,
- Bankruptcy Court Northern District Illinois --A valuation matter For a Trustee in a Chapter 7 Case ,
- Federal District Court, Southern District New York --Prepared ,as an expert in real estate and UCC Sales, an Affidavit in support of a Motion for a Temporary Restraining Order to prevent the sale of a property valued in excess of \$300 Million Dollars.
- Cook County ,Il Law Division --against a Illinois licensed attorney for malpractice in a real estate related matter - testified as the Expert Opinion Witness as to " professional negligence " as used in IPI No 3.08 in front of a 12 person jury trial ,

-Numerous appearances as a Rebuttal witness over the years , in different State Courts, typically to defend ,as the Real Estate Broker of Record, as to the sale process or as to the results of a foreclosure sale. A full list of all cases in which I have been engaged is available to you and to be part of my Opinion, if needed.

If later engaged , as your Expert Witness, these terms and rates stated above would apply. I would review all the Pleadings, Depositions, communications other experts opinions, and other relevant material , as you direct, and provide you with my opinion ,about the specific disputed issues in the case upon which you want me to opine. I suggest I start by reviewing the relevant Pleadings in the current case, the initial case against the Homeowners that was settled, the Mandatory Arbitration and Chapter 7 Bankruptcy cases.

I quote in part from an email that the attorney who engaged me , in the “professional negligence” jury trial noted above, a few years ago, after he obtained a very successful multi million dollar verdict, "...Again thank you for your patience and cooperation with what turned out to be an extraordinary unusual trial.... The jurors we spoke

with were also very complimentary of you as a witness.”

I am an Active Member of the Illinois Bar - in good standing since May 17,1966. My ARDC number is 1528017.

I am an Active Licensed Illinois Real Estate Managing Broker- in good standing from October 20, 1972 through April 30,2021 - License Number 471001335.

I am also licensed as a Active Real Estate Broker in good standing, in Indiana and Michigan. I hold inactive status as a Broker or Salesperson in Florida, New York, Arizona , Wisconsin and New Jersey.

If you have any other questions please contact me and thank you for calling.

Please confirm your receipt of this Email. Please forward a copy of the caption of the case showing the names of the parties and any other names that I should check for conflicts , if you decide to proceed with the engagement.

Thank you for considering me to act for you and your client in this matter.

Alan Kravets

Alan Kravets,Esq

1340 N Astor St.

Suite 2803

Chicago, Illinois 60610

+1(312) 320-3264

Alan@kravets.net