

Date : 11/23/2022 7:31:24 AM
From : "Paul Dulberg"
To : "Alphonse Talarico"
BCc : "Paul Dulberg" , "Tom Kost"
Subject : New case: Baudin/Olsen/ADR Complaint
Dear Mr Talarico,

It is time to get the ball rolling on the fraudulent ADR contract.

I believe I remember you said it would be an additional \$10,000 as a retainer.

I can issue the check next Tuesday, November 28, 2022 assuming you still want the case and the amount needed is correct.

If you do please send me the retainer agreement to sign.

Please advise.

I believe we have 3 defendants and multiple counts (Rough list is below, it's off the top of my head and may not include everything we can charge), lets discuss these and refine as needed to make a legally sufficient complaint including all participants involved in the fraudulent contract:

1. Baudins:

- a.) Contract Fraud and affidavit fraud in bankruptcy court
- b.) Contract Fraud at Alternative Dispute Resolutions Inc.
- c.) Legal Malpractice for failure to notify the circuit court of the bankruptcy
- d.) Legal Malpractice for failure to inform Dulberg of Gagnon's non-answer the Cross-Claim resulting in Gagnon admitting to all allegations in Dulberg's complaint and Failure to inform Dulberg that Gagnon did not answer interrogatories.
- e.) Legal Malpractice for failure to inform Dulberg of Popovich's Legal Malpractice for Gagnon's non-answer the Cross-Claim resulting in Gagnon admitting to all allegations in Dulberg's complaint and Failure to inform Dulberg that Gagnon did not answer interrogatories.
- f.) Legal Malpractice for failure to compel Gagnon to answer interrogatories
- g.) Legal Malpractice for failure to file a summary judgement motion on behalf of Dulberg against Gagnon for admitting all allegations in Dulberg's complaint as true.
- h.) Failure to protect the estate from fraud and Failure to Maximize the estate by entering into a fraudulent contract with a cap on recovery.

2. Olsen

- a. Contract Fraud in bankruptcy court
- b. Failure to ensure the contract used at ADR matched the Contract approved to be entered into at bankruptcy court
- c. Failure to recognize that the attached contract to the Baudins law group's affidavit was not entered into by the Baudin Law group but was rather a contract with Baudin & Baudin
- d. Failure to protect the estate from fraud

3. ADR

- a. Acceptance of an obviously flawed contract that is different than the contract originally authored by ADR.
- b. Failure to follow and enforce the terms/rules written in the contract about modifications to the contract.

I believe all 3 defendants could be charged with conspiracy to commit fraud against the bankruptcy estate as well.

Thanks,
Paul