

Date : 12/19/2022 12:00:34 PM

From : "Paul Dulberg"

To : "Law Office Of Alphonse Talarico"

BCc : "Paul Dulberg" , "Tom Kost"

Subject : Re: Final Final Draft of Reply to Response to motion to Exclude

Dear Mr Talarico,

This has my Blessing as is but I leave it up to your discretion to add the same points I made earlier (listed below) or use them in orally in court as you see fit or the need arises.

Thank You,
Paul

- If defendants argue that Mast did not give Dulberg the Tilschner slip ruling Dulberg believes this becomes a genuine issue of material fact that Dulberg would want a Jury to rule.
- If Mast is willing to submit himself to a fingerprint and DNA test, Dulberg is willing to pay for the comparable analysis of Masts DNA and Fingerprints and see if they can be identified on the original Tilschner slip ruling that Dulberg still posses and has preserved.
- The Tilschner ruling plays a major part and appears at or near the top of any result in any case law search software (eg. west law, etc.) when doing a search for Restatement of Torts 318 in Illinois case law search software. It is unreasonable to say that when Dulberg refers to 318 he is not discussing Tilschner.
- The original copy of the Tilschner slip copy in Dulberg's possession, Page 3, has a large portion highlighted in Yellow (By Mr Mast) on the 318 Restatement (Second) of Torts.

On Dec 19, 2022, at 11:51 AM, Alphonse Talarico
<contact@lawofficeofalphonsetalarico.com> wrote:

Please see the attached.

I await your instructions.

Thank you,
Alphonse A. Talarico, Esq.
<Plaintiff's Reply to Defendants Response to Plaintiff's Motion To Exclude
Deposition of Hans Mast taken on June 25 2020.doc>