

Date : 4/10/2023 12:56:11 PM
From : "Paul Dulberg"
To : "Law Office Of Alphonse Talarico"
Cc : "Alphonse Talarico"
BCc : "Paul Dulberg" , "Tom Kost"
Subject : Re: Dulberg vs Baudin 2022 L 01-0905 CCI

Mr Talarico,

Just to confirm, Is the \$5400 mentioned in the email chain the amount needed as the experts retainer for the Baudin case?

Thanks,
Paul

On Apr 10, 2023, at 10:29 AM, Alphonse Talarico
<contact@lawofficeofalphonsetalarico.com> wrote:



From: Alan Kravets <alan@kravets.net>
Sent: Wednesday, February 15, 2023 5:31 PM
To: Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>
Subject: Re: Dulberg vs Baudin 2022 L 01-0905 CCI

Al
No problem-
I read the order and transcript —
Looking forward to seeing a copy of your appeal —
Alan

Alan Kravets
1340 N. Astor St.
Unit 2803
Chicago , IL 60610
312-320-3264
Alan@kravets.net

On Feb 15, 2023, at 1:15 PM, Alphonse Talarico
<contact@lawofficeofalphonsetalarico.com> wrote:

Mr. Kravets,

I am sorry I have not responded to your email sooner but I honestly haven't had the time.

I could list all that I am doing but lets just say wake, work, eat and sleep again.

The judge granted summary judgement in the Dulberg v. Popovich (Report of Proceedings attached) and I am going to appeal the decision.

The judge (calendar R) in the Law Division case at the Case Management Conference transfered the case for reassignment then to Calendar S then reassigned today to Calendar U.

I will review your email in detail as soon as I can take a deep breath.

Sorry about the delay.

AI



From: Alan Kravets <alan@kravets.net>

Sent: Friday, February 3, 2023 10:18 AM

To: Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>

Cc: Alan Kravets <alan@kravets.net>

Subject: Dulberg vs Baudin 2022 L 01-0905 CCI

Dear Mr Talarico

You have already seen some information about myself in the form of a Resume/ CV .

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 \$5,400 and use it for the first 12 hours of work and costs if needed, and will bill monthly thereafter. Any unused time will be refunded. The retainer will be held in my general business account and will require the Informed Consent of your Client to allow me to do so. I will, in a separate letter, request your Clients written Informed Consent.

Within the last few years, I have been engaged to testify as an expert at trial or by deposition in some of the following cases;
-Lake County II -Suit for Specific Performance

-Cook County ,Il Law Division—Commission Dispute, a national brokerage firm and their salesperson ,

-Cook County, Il Law Division—Malpractice case ,a licensed Illinois Attorney

-Hennepin County (Minneapolis) Mn — Broker malpractice, an industrial/commercial broker

-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 —Malpractice case, 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, and information on the Chapter 11 Bankruptcy case.

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 30,2023 (and will renew my current License) - 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.
Based upon the Caption of the case I do not
have any conflicts with the named
Defendants.

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

Alan Kravets

Alan Kravets, Esq
1340 N Astor St.
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Chicago, Illinois 60610
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<Report of Proceedings Feb 1 2023 CC-Civil - 2017LA000377 - 2_8_2023 - - - REOP -
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