

Date : 6/6/2023 12:21:20 PM

From : "T Kost"

To : "Paul Dulberg" , "Alphonse Talarico"

Subject : Affidavit paragraph #3 edit

CURRENT EDITING OF AFFIDAVIT PARAGRAPH #3:

3. In 2013 I qualified for P2a status from the State of Illinois which is permanent and continues to be my permanent classification through today. P2a classification is defined as :

PAUL'S SUGGESTED CHANGE IS AS FOLLOWS:

3. On June 28, 2011 I suffered injuries which qualified me for a P2A disability classification from the Illinois Secretary of State which is a permanent and continues to be my permanent classification through today. P2A classification is defined as:ur

ALSO IN THE ANSWER TO THE BAUDIN SUMMARY JUDGEMENT MOTION WE HAVE:

R2.45 Plaintiff Paul R. Dulberg is also classified by the Illinois Secretary of State to have a class P2A disability as a result of the injuries that occurred on June 28, 2011. A class P2A disability is defined as follows:

Tom's suggested solution is that R2.45 in the answer has to match paragraph #3 in the affidavit. Because Paul doesn't really know if he qualified in 2013 or some other year we can avoid any possible incorrect statement in the affidavit by avoiding the number "2013" in our answer or affidavit.

My suggestion is that the R2.45 statement listed above and Paul's edit of paragraph #3 in the affidavit are the most accurate statements we can make. If Paul cannot say with certainty that qualification occurred in 2013, then we should avoid any statement with the term "2013" in it.