

Date : 6/10/2023 7:41:34 AM

From : "Alphonse Talarico"

To : "Paul Dulberg"

Subject : Re: Response brief Dulberg v. Baudin et al 2022L010905

Gentlemen,

I am saying that pursuant to Rule, if the Response is not cut down or special permission by motion, which is not guaranteed to be obtained, is given a Response brief in excess of 15 pages is subject to and likely to be stricken.

As your attorney, I am advising you of the risks, but I did not create the rule.

Please indicate your choice.

Thank you,

Alphonse A. Talarico, Esq.

From: Paul Dulberg <Paul_Dulberg@comcast.net>

Sent: Saturday, June 10, 2023 7:24 AM

To: Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>

Cc: Tom Kost <tkost999@gmail.com>

Subject: Re: Response brief Dulberg v. Baudin et al 2022L010905

I'm just waking up, are you saying the courts rules don't allow us to respond with the facts because there are too many?

On Jun 10, 2023, at 7:21 AM, Alphonse Talarico
<contact@lawofficeofalphonsetalarico.com> wrote:

Gentlemen ,

Please see the attached General Order Law Division (Page 7 only) limiting Response Briefs to 15 pages as I previously noted in verbal communications.

Our Response, without incorporating yesterdays changes/additions is already 23 pages.

A solution to consider is review the Response and edit any unnecessary wording or topics.

Another solution is to file a motion for permission to increase the page limit of the Response.

I have been working non stop all month on your three litigation cases and, after the experience of the last two months, i request a payment of \$12, 000.00 be made today, so that I will not have to wait to July (the payment in June was related to work for the month in the month of May.

As always thank you for the confidence you have shown in litigation your very serious and complicated matters.

Your anticipated cooperation is greatly appreciated,

Alphonse A. Talarico, Esq.

<General Orders Law Division 61892a0c-1207-4a8c-8e45-21c9161dbb25.pdf>

