

T Kost <tkost999@gmail.com>

## **ADR Amended Complaint**

25 messages

Wed. Jun 14, 2023 at 3:48 PM

T Kost <tkost999@gmail.com>
To: Paul Dulberg <Paul\_Dulberg@comcast.net>

This version is edited and updated with the latest 'Olsen Appeal' information (including Kujawa).

Let's get this corrected and sent to Alphonse also (since the logic of both documents should fit together). This is obviously the same copy-paste arguments we will use in the Baudin Answer.

attached

Draft ADR Systems Amended Complaint .pdf

Paul Dulberg <Paul\_Dulberg@comcast.net> To: Tom Kost <tkost999@gmail.com>

Thu, Jun 15, 2023 at 9:16 AM

Corrections to the ADR Amended Complaint (Draft ADR Systems Amended Complaint copy.pdf) and Olsen appeal (2023-06-14\_Draft of Olsen Appeal prepared by client copy.pdf) - see attached

I am sending changes as I go. This is the first correction and it applies to both.

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attached

<Draft ADR Systems Amended Complaint .pdf>

corrections to the ADR Amended Complaint and Olsen appeal.txt

T Kost <tkost999@gmail.com>

Thu. Jun 15, 2023 at 9:27 AM

To: Paul Dulberg <Paul\_Dulberg@comcast.net>

Corrections added. Updated version of ADR Amended Complaint attached. Is this ready to send out to Mr Talerico?

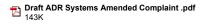
On Thu, Jun 15, 2023 at 9:17 AM Paul Dulberg <Paul\_Dulberg@comcast.net> wrote:

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<Draft ADR Systems Amended Complaint .pdf>



Paul Dulberg <Paul\_Dulberg@comcast.net> To: Tom Kost <tkost999@gmail.com>

Thu, Jun 15, 2023 at 9:28 PM

You wanted it done quick, here it is in.txt form. I did not finish marking up the PDF you provided with pretty highlights and marked changes and the .txt file has had the nomenclatures removed since the were out of sequence in the PDF you provided.

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17 attachments

3/12/2024, 4:33 PM 1 of 15

	corrections to the ADR Amended Complaint.txt 41K
7	Subpoena Joseph Olsen served October 24, 2019.pdf 177K
7	Fwd Re Paul Dulberg 1483578 12LA178-2.pdf 190K
7	2022-09-26_1633 PM_Fwd REQUEST FOR TRANSCRIPTREPORT OF PROCEEDING BK No 1483578.pdf 95K
	DULBERG 10-31-16.pdf 136K
	PAULINV.pdf
	2022-10-28_0752 AM_RE 20221026Scan of Signed Authority to Release ADR System File 33391BMAGpdf.pdf
	101K  2022_10_25_10_34_55.pdf 670K
	CC-Civil - 12LA000178 - 2_24_2022 REOPpdf
	119K  Filed Complaint December 8 2022 DisplayFromAWS.pdf
	1644K CC-Civil - 12LA000178 - 3_3_2022 REOP (4).pdf 56K
	56K 12LA0001782016-08-10ORD_0097.pdf
7-	1-91
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	2017-04-20_SSA-Notice of Decision — Fully Favorable.pdf 2372K
	CC-Civil - 12LA000178 - 3_2_2022 REOP (3).pdf 162K
7	<b>12LA0001782015-11-06APE_0083.pdf</b> 35K
7	<b>12LA0001782016-12-12ORD_0098.pdf</b> 69K
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	one more correction.txt 1K
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            >>> < Draft ADR Systems Amended Complaint .pdf>
            >
   corrections to the ADR Amended Complaint copy2.txt
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                                                                                                                                                                                             Sat Jun 17 2023 at 9:04 AM
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  corrections added. attached
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Draft ADR Systems Amended Complaint .pdf 153K

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Sun, Jun 18, 2023 at 12:09 PM

Tom,

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My point in doing this is to show only the relevant parts of the statute and it makes sense since your already quoting shortened statutes in some instances but not all relevant portions of the

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 $\begin{tabular}{ll} \hline & corrections to the ADR Amended Complaint copy3 copy.txt \\ & 25K \end{tabular}$ 

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praft ADR Systems Amended Complaint .docx

4 of 15 3/12/2024, 4:33 PM 30K

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Sun, Jun 18, 2023 at 8:38 PM

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3 atta	achments	
	Oraft ADR Systems Amended Complaint 4.txt 14K	
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>>> Let's get this corrected and sent to Alphonse also (since the logic of both documents should fit together). This is obviously the same copy-paste arguments we will use in the Baudin Answer.
>>>
>>> attached
>>> <Draft ADR Systems Amended Complaint .pdf>
>>
>>
>>
```

<Draft ADR Systems Amended Complaint .docx>

## 5 attachments



RetainerAgreement1of4.jpg 751K



RetainerAgreement2of4.jpg



RetainerAgreement3of4.jpg 477K



RetainerAgreement4of4.jpg 519K



T Kost <tkost999@gmail.com>
To: Paul Dulberg <Paul\_Dulberg@comcast.net>

Mon, Jun 19, 2023 at 7:18 AM

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[Quoted text hidden] [Quoted text hidden]

<Draft ADR Systems Amended Complaint 4.txt>

<Draft ADR Systems Amended Complaint 4.docx>

<Draft ADR Systems Amended Complaint 4.pdf>

[Quoted text hidden]

<Draft ADR Systems Amended Complaint .docx>

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- 1. you could easily use the previous edits before #4.
- 2. You are correct, Microsoft is the issue, Microsoft office is a nightmarish program where if you don't pay them you can only view the document. FYI the importing of the docx into libreoffice may work but its changing the original Microsoft Office formatting only you don't notice it till you open the same document side by side in both programs
- 3. Why not send me the PDF from libreoffice of the same docx file you sent yesterday so I can stop this incessant banter and provide you with the 5th round of correction in the format you're used
- 4. I don't know why we don't just go back to using unformatted .TXT files. We have been doing it for years with no issues. Then after all changes are done and it is good it can be formatted into something that is double line spaced, tabs and only one space after periods with modern typesetting standards rather than the 1950's standards of setting type on a typewriter

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Third, it would be nice if we had an edit log so we can see our edit history in a simple way without having a giant wall of text. It is nice if we can easily identify past edits so we know if we are wasting our time (going in circles)

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Draft ADR Systems Amended Complaint .pdf 139K

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NOT sure why you sent me a docx file.
Had to completely rebuild and reformat it to use.
Id look ar age PDF attached and steal the text from the .txt attached. I included a export to .docx if that's what you want to use now.

Cpraft ADR Systems Amended Complaint 4.txt>

Cpraft ADR Systems Amended Complaint 4.docx>

Cpraft ADR Systems Amended Complaint 4.pdf>

raft ADR Systems Amended Complaint 4.pdf>

On Jun 18, 2023, at 2:23 PM, T Kost <tkost999@gmail.com> wrote:

This is a .docx file (microsoft) and not an .odt file (libreoffice)

On Sun, Jun 18, 2023 at 2:16 PM T Kost <tkost999@gmail.com> wrote: updated attached

On Sun, Jun 18, 2023 at 12:09 PM Paul Dulberg < Paul\_Dulberg@comcast.net> wrote:

please change the parts that cite statutes in the attached .txt file. I noticed this is my second time having to send the changes to the statutes. My point in doing this is to show only the relevant parts of the statute and it makes sense since your already quoting shortened statutes in some instances but not all relevant portions of the statute.

Paul

On Jun 17, 2023, at 9:04 AM, T Kost <tkost999@gmail.com> wrote:

corrections added. attached

On Fri, Jun 16, 2023 at 2:28 PM Paul Dulberg <Paul\_Dulberg@comcast.net> wrote:
After doing exhaustive searches on the facts and finding the best exhibits I was tired and falling asleep and needed to get it done and skipped finding out how many numbers were screwed up so I used bullet points.

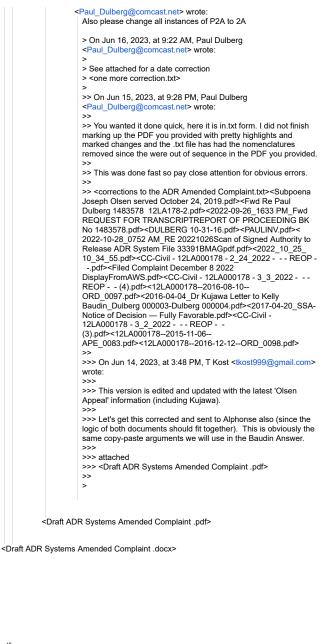
Today I learned the issue I ran into last night.
The nomenclature is screwed up in the PDF, there were 2 number 19's

The numbers in the attached .txt file are from your PDF but will need to be renumbered anyway.

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<Draft ADR Systems Amended Complaint .pdf>

## 6 attachments



RetainerAgreement1of4.jpg



RetainerAgreement2of4.jpg 717K

11 of 15 3/12/2024, 4:33 PM



RetainerAgreement3of4.jpg



RetainerAgreement4of4.jpg 519K

Draft ADR Systems Amended Complaint 5.txt

17LA000377--2017-11-28--COA\_0002.pdf 608K

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updated ADR amended complaint attached

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Draft ADR Systems Amended Complaint .pdf

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To: Tom Kost <tkost999@gmail.com>

Tue, Jun 20, 2023 at 11:07 AM

Approved.

Please Send this to alphonse and CC me in on the email

Paul Dulberg <Paul\_Dulberg@comcast.net>

This is the one I approved this morning

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3/12/2024, 4:33 PM 12 of 15

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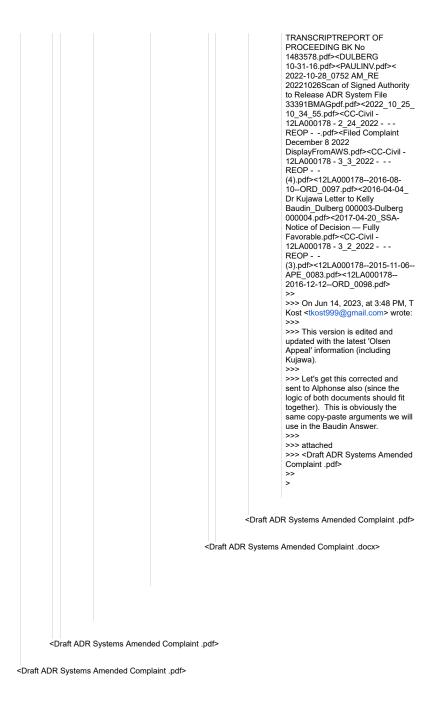
Id look ar age PDF attached and steal the text from the .txt attached. I included a export to .docx if that's what you want to use now. < Draft ADR Systems Amended Complaint 4.txt> <Draft ADR Systems Amended Complaint 4.docx> <Draft ADR Systems Amended Complaint 4.pdf> On Jun 18, 2023, at 2:23 PM, T Kost <tkost999@gmail.com> wrote: This is a .docx file (microsoft) and not an .odt file (libreoffice) On Sun, Jun 18, 2023 at 2:16 PM T Kost <tkost999@gmail.com> wrote: updated attached On Sun, Jun 18, 2023 at 12:09 PM Paul Dulberg <Paul\_Dulberg@comcast.net> wrote: Tom, please change the parts that cite statutes in the attached .txt file. I noticed this is my second time having to send the changes to the My point in doing this is to show only the relevant parts of the statute and it makes sense since your already quoting shortened statutes in some instances but not all relevant portions of the statute.. Paul On Jun 17, 2023, at 9:04 AM, T Kost <tkost999@gmail.com> wrote: corrections added. attached On Fri, Jun 16, 2023 at 2:28 PM Paul Dulberg <Paul\_Dulberg@comcast.net> wrote: After doing exhaustive searches on the facts and finding the best exhibits I was tired and falling asleep and needed to get it done and skipped finding out how many numbers were screwed up so I used bullet points. Today I learned the issue I ran into last night. The nomenclature is screwed up in the PDF, there were 2 number 19's The numbers in the attached .txt file are from your PDF but will need to be renumbered anyway. On Jun 16, 2023, at 12:53 PM, T Kost <tkost999@gmail.com> wrote: why did you not tell me which paragraphs the edits belong to? Bullet lists are useless to me because there is no information about where the edit should be inserted. On Fri, Jun 16, 2023 at 9:23 AM Paul Dulberg <Paul\_Dulberg@comcast.net> wrote:
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14 of 15 3/12/2024, 4:33 PM

1483578

Joseph Olsen served October 24, 2019.pdf><Fwd Re Paul Dulberg

12LA178-2.pdf><2022-09-26\_1633 PM\_Fwd REQUEST FOR



Draft ADR Systems Amended Complaint .pdf 142K

15 of 15 3/12/2024, 4:33 PM