

Date : 7/25/2023 4:35:14 AM

From : "Paul Dulberg"

To : "Alphonse Talarico"

Cc : "Tom Kost"

BCc : "Paul Dulberg"

Subject : Final draft of Surreply to Baudins Reply to Dulberg's Response to Baudin Motion to Dismiss

Attachment : Exhibits.zip; 2023-07-23_Final draft of _Dulberg surreply.pdf;

Dear Mr Talarico,

Attached is my final draft of a surreply to Baudins reply to Dulberg response to Baudins Motion to Dismiss with the exhibits in a separate zip file.

On page 11 ¶25 and page 13 ¶26 are two quoted excerpts from the case of Bloom (on pages 11-12).

These 2 excerpts are actually quoted in bloom from previous cases and I am not sure how to cite them properly. I highlighted the text of the citations in red.

The only thing that I can think to possibly add further is the diagnosis from psychologist Dr McMasters about recurring major depression for the disability issue.

The ARDC Complaint against Clinton-Williams is exhibit 4 in the surreply and should probably be sent to the ARDC before or on the same day we submit the surreply.

Thank you,
Paul