

Date : 9/1/2023 9:45:18 AM

From : "T Kost"

To : "Paul Dulberg" , "Alphonse Talarico"

Subject : Strategy which focuses on primary cause of action

There are a few things that I believe we are doing incorrectly. This needs to be discussed so I am starting this email thread to explain my position.

1) When Dulberg filed lawsuit 17LA377 against Popovich and Mast the complaint listed causes of action.

2) During the law and motion portion of 17LA377 fraud on the court was committed by officers of the court.

3) When we discovered fraud on the court taking place a NEW CAUSE OF ACTION emerged against officers of the court committing fraud on the court.

The problem we are experiencing is that we did not recognize that the new cause of action (fraud on the court) is now the PRIMARY CAUSE OF ACTION. I believe this is a mistake.

Once you know about the fraud on the court (like now), your primary cause of action should change to "fraud on the court" and "extrinsic fraud". Your secondary causes of action are your current lawsuits.

You cannot wait to act on the fraud. You have to act on the fraud on the court as your primary cause of action.

What you are doing wrong in my opinion is that you do not recognize "fraud on the court" as your primary cause of action. You already have a case under [Civil Rights Violation – Title 42 Section 1983](#) but you are not acting on it because you are pursuing secondary causes of action.