

Date : 1/7/2024 2:15:10 PM
From : "Alphonse Talarico"
To : "Paul Dulberg" , "Paul Dulberg" , "T Kost"
Subject : I S.Ct R 315(c) (5)

Illinois Supreme Court Rule 315(c)(5)

Argument: The Illinois Supreme Court should review this matter because the trial court summary judgment ruling disregarded the Supreme Court's clear statement in *v. Carlson* (A) that in a legal malpractice cases the Statute of Limitations does not begin to run until a pecuniary loss is incurred.

In this matter the pecuniary loss was first experienced on December 20 (A) and Dulberg filed his Malpractice action within 2 years of that date.

Furthermore, pursuant to the Constitution of the State of Illinois, Article VI The Judiciary Section 16

SECTION 16. ADMINISTRATION

General administrative and supervisory authority over all courts is vested in the Supreme Court and shall be exercised by the Chief Justice in accordance with its rules. The Supreme Court shall appoint an administrative director and staff, who shall serve at its pleasure, to assist the Chief Justice in his duties. The Supreme Court may assign a Judge temporarily to any court and an Associate Judge to serve temporarily as an Associate Judge on any Circuit Court. The Supreme Court shall provide by rule for expeditious and inexpensive appeals.

(Source: Illinois Constitution.)

A major issue that was discovered subsequent to the trial court granting summary judgment to the Defendants/Appellees is that

one trial court judge was the judge for the underlying case and the current case, a matter of over (X) years, and the second judge who replaced the aforementioned judge for the hearing on Defendants/Appellees Motion for Summary Judgment had, for all times relevant herein each recused themselves for all cases assigned to them other than this case, based upon the fact that they were personal friends of the owner of Defendant/Applees' law firm.

