



T Kost &lt;tkost999@gmail.com&gt;

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**Fwd: Return of Case Files etc... Re: Motions for Withdrawal of Representation**

1 message

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

Sat, Apr 13, 2024 at 11:26 AM

Begin forwarded message:

**From:** Tom Long <[tlong@konicekdillonlaw.com](mailto:tlong@konicekdillonlaw.com)>  
**Subject:** Return of Case Files etc... Re: Motions for Withdrawal of Representation  
**Date:** April 12, 2024 at 12:42:14 PM CDT  
**To:** "Paul\_Dulberg@comcast.net" <Paul\_Dulberg@comcast.net>  
**Cc:** Sheila Jacobsen <[sheila@konicekdillonlaw.com](mailto:sheila@konicekdillonlaw.com)>

Mr. Dulberg,

I have been engaged to assist Mr. Talarico in responding your request for file materials. It is our position that you are already in possession of all of the materials that are contained in Mr. Talarico's files relative to his representation of you. In fact, a significant portion of his file materials consist of documents that you provided to him and correspondence on which you were copied. As for Mr. Talarico's time sheets, he is in the process of scanning those handwritten documents, which number in the hundreds, and we will provide those to you within twenty-eight days.

Tom

**Thomas J. Long**  
**Konicek & Dillon, P.C.**  
**21 W. State St.**  
**Geneva, IL 60134**  
**(P) 630-262-9655**  
**(F) 630-262-9659**  
**[tlong@konicekdillonlaw.com](mailto:tlong@konicekdillonlaw.com)**

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**From:** Paul Dulberg <[Paul\\_Dulberg@comcast.net](mailto:Paul_Dulberg@comcast.net)>  
**Sent:** Tuesday, April 9, 2024 7:56 AM  
**To:** Paul Dulberg <[Paul\\_Dulberg@comcast.net](mailto:Paul_Dulberg@comcast.net)>  
**Cc:** Alphonse Talarico <[contact@lawofficeofalphonsetalarico.com](mailto:contact@lawofficeofalphonsetalarico.com)>; Tom Kost <[tkost999@gmail.com](mailto:tkost999@gmail.com)>  
**Subject:** Return of Case Files etc... Re: Motions for Withdrawal of Representation

Dear Mr Talarico,

We have not received a response to the previous emails in this email chain.

If you do not intend to return our property please state a reason as to why you feel we are not entitled to it.

Otherwise, Please provide a date that we (Paul Dulberg, Thomas Kost and Richard Kost) may expect to receive all materials you have related to our various cases.

Thank you in advance for your help with returning our property in a timely manner.

/s/Paul Dulberg

Paul Dulberg  
4606 Hayden Ct.  
McHenry, IL 60051  
(847) 497-4250

On Mar 27, 2024, at 4:02 PM, Paul Dulberg  
<[Paul\\_Dulberg@comcast.net](mailto:Paul_Dulberg@comcast.net)> wrote:

Mr Talarico,

We require the return of our property including but not limited to:

- All case files
- All work product
- All communications with anyone discussing our cases
- All phone records of discussions of cases
- All notes
- All receipts (incoming and outgoing)
- List of vendors used with contact information (including experts)
- All 201k communications
- All exparte communications
- Any Westlaw account or other type of account paid for by us including the administrative account (logins and passwords) at Thompson Reuters (west law) that we paid for.
- Thumbdrives
- Complete accounting of all monies paid to you and spent by you.
- All Bank statements for any and all Trust accounts you opened with the money we paid you from the opening to the closing of each account.

This is a blanket request for everything (even remotely associated) with our cases in digital form and is not limited to the list above.

We require the return of the retainers we paid for the additional cases that you never moved on.

Paul Dulberg  
847-497-4250  
[4606 Hayden Court](#)

McHenry, Illinois 60051

On Jan 25, 2024, at 7:37 AM, Paul Dulberg <[Paul\\_Dulberg@comcast.net](mailto:Paul_Dulberg@comcast.net)> wrote:

Mr Talarico,

We do not necessarily agree with your statements in this email.

We will be filing a written response to your various Motions to Withdraw.

We will be objecting to the motion and asking the court to delay your withdrawal until you have returned all of our property, provided a complete accounting, provided all bank statements from the trust accounts and withdrawn any liens you have filed.

Paul

On Jan 24, 2024, at 8:06 AM, Alphonse Talarico <[contact@lawofficeofalphonsetalarico.com](mailto:contact@lawofficeofalphonsetalarico.com)> wrote:

Gentlemen,

I am required to ask before actually setting the motions, if either of you in any of the capacities represented have an objection to my withdrawal of representation.

Based upon the events, communications or lack thereof, and breach of our amended Attorney-Client agreement during the last month or so I am required by the Professional Rules of Conduct to do so.

I will wait an appropriate length of time (until tomorrow) to file and serve my motions.

Sincerely,  
Alphonse A. Talarico Esq.

**From:** Paul Dulberg <[Paul\\_Dulberg@comcast.net](mailto:Paul_Dulberg@comcast.net)>  
**Sent:** Wednesday, March 27, 2024 4:02 PM  
**To:** Paul Dulberg <[Paul\\_Dulberg@comcast.net](mailto:Paul_Dulberg@comcast.net)>  
**Cc:** Alphonse Talarico <[contact@lawofficeofalphonsetalarico.com](mailto:contact@lawofficeofalphonsetalarico.com)>; Tom Kost <[tkost999@gmail.com](mailto:tkost999@gmail.com)>  
**Subject:** Re: Motions for Withdrawal of Representation

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Paul Dulberg

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