



T Kost <tkost999@gmail.com>

Emergency Motion

1 message

Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>

Thu, Nov 2, 2023 at 7:50 AM

To: George Flynn <gflynn@karballaw.com>, Michelle Blum <mblum@karballaw.com>

Dear George Flynn and Michelle Blum,

I am in the process of drafting an emergency motion to:

-allow an audit to be conducted on the Record on Appeal to discover missing/changed parts and to supplement the Record on Appeal for all missing/changed parts.

-to supplement the Record on Appeal to include the Thumb Drive received under subpoena of the Hans Mast deposition that Attorney Flynn and Attorney Williams conducted. As you might recall, I offered that into evidence but the Honorable Judge Meyer refused it after first saying he would accept it.

-the factual information the Honorable Judge Berg only handled the last court date after replacing the Honorable Judge Meyer, who had handled the underling matter where Attorney Popovich represented Paul Dulberg, then closed discovery completely on this own motion in the current case where Attorney Popovich's Law Offices was a named Defendant, all after Judge Meyer had recused himself from an unrelated case where Attorney Popovich was a named Defendant (because he was a friend of Attorney Popovich).

Furthermore, I will be asking for an extension of the time to file Appellant's brief that is due tomorrow, until the Record on Appeal has been audited and supplemented.

Please indicate your acceptance or objection as soon as possible.

I will follow this email by a telephone call.

Sincerely,

Alphonse A. Talarico

312-808-1410

312-608-1410