



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

**17LA377 ROP's now filed - update appellate records**

8 messages

Paul Dulberg &lt;Paul\_Dulberg@comcast.net&gt;

To: McHenry County Circuit Clerk &lt;mchenrycircuitclerk@circuitclerkofmchenrycounty.org&gt;

Cc: Alphonse Talarico &lt;contact@lawofficeofalphonsetalarico.com&gt;, Tom Kost &lt;tkost999@gmail.com&gt;

Wed, Nov 15, 2023 at 10:49 AM

Dear Circuit Clerk,

My understanding from Judy Carlson (Court Administrator) is that 2 missing reports of proceedings (1-10-2018 and 2-27-2018) are now filed with and stamped by your office in case 17LA377.

Please forward these 2 ROP's to the clerk of the appellate court and update the previous file (ROP\_Vol\_1\_of\_1\_230421\_1628\_8FF9DDF1.pdf) your office certified and sent the appellate court on 4-24-2023.

Of course I am willing to pay any costs or fees associated with updating the appellate courts record, Just send a link or contact me for payment.

Thank You,  
PaulPaul Dulberg  
(847) 497-4250[Paul\\_Dulberg@comcast.net](mailto:Paul_Dulberg@comcast.net)

Begin forwarded message:

**From:** Judy Carlson <JACarlson@22ndcircuit.illinoiscourts.gov>**Subject:** RE: [EXTERNAL] Fwd: 17 LA 377**Date:** November 9, 2023 at 4:02:37 PM CST**To:** Paul Dulberg <pdulberg@icloud.com>

Good Afternoon, Mr. Dulberg,

Stacey has retired. I have contacted her regarding two transcripts that do not seem to be in the file, 1-10-18 and 2-27-18. I have attached the report of filed transcripts from your case and you can see that the other transcripts have been filed, as I have highlighted them.

I have reached out to Stacey and asked her to file the two missing transcripts.

I will keep you posted as to when the two transcripts get filed.

I apologize for this oversight.

Thank you and have a nice evening.

Judy Carlson, CSR

Official Court Reporter

Court Reporting Services Supervisor

2200 N. Seminary Ave. Suite 355

Woodstock, IL 60098

(815) 334-4373

**From:** Paul Dulberg <pdulberg@icloud.com>**Sent:** Thursday, November 9, 2023 2:25 PM**To:** Stacey Collins <SACollins@22ndcircuit.illinoiscourts.gov>**Cc:** Judy Carlson <JACarlson@22ndcircuit.illinoiscourts.gov>**Subject:** [EXTERNAL] Fwd: 17 LA 377

Dear Stacy Collins,

Please provide confirmation that you filed all of the attached PDF's of transcripts you created and sent to me with the circuit clerk on or about March 24, 2022.

If you need copies of the payment receipts for producing these reports of proceedings let me know and I will forward them to you.

Thank you,

Paul

Paul Dulberg

[pdulberg@icloud.com](mailto:pdulberg@icloud.com)

Begin forwarded message:

**From:** Stacey Collins <SACollins@22ndcircuit.illinoiscourts.gov>**Subject:** 17 LA 377**Date:** March 24, 2022 at 2:22:58 PM CDT**To:** Paul Dulberg <pdulberg@icloud.com>

Mr. Dulberg,

Attached please find PDF Reports of Proceedings for the following dates in the above-referenced case:

01 10 18

02 27 18

09 12 18

02 10 21

04 01 21

Stacey A. Collins

Official Court Reporter

22<sup>nd</sup> Judicial Circuit

Woodstock, IL

**CAUTION:** This email originated from outside of the County network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

While mismatches between the actual SENDER field and the FROM field are common. It is also a common spoofing tactic. For additional reference, this email was actually sent from [pdulberg@icloud.com](mailto:pdulberg@icloud.com)

If you have any questions about the legitimacy of this email, please call the helpdesk at extension 4828.

LEGAL CONFIDENTIAL: The information in this e-mail and in any attachment contains information which is legally privileged. It is intended only for the attention and use of the named recipient. If you are not the intended recipient, you are not authorized to retain, disclose, copy or distribute the message and/or any of its attachments. If you received this e-mail in error, please notify Stacey A. Collins, CSR, and delete this message.

Begin forwarded message:

**From:** Judy Carlson <[JACarlson@22ndcircuit.illinoiscourts.gov](mailto:JACarlson@22ndcircuit.illinoiscourts.gov)>  
**Subject:** RE: [EXTERNAL] Fwd: 17 LA 377  
**Date:** November 14, 2023 at 11:20:02 AM CST  
**To:** Paul Dulberg <[pdulberg@icloud.com](mailto:pdulberg@icloud.com)>

Good Morning, Mr. Dulberg,

The transcripts have been filed for 1-10-18 and 2-27-18.

Thank you,

Judy Carlson, CSR  
Official Court Reporter  
Court Reporting Services Supervisor  
2200 N. Seminary Ave. Suite 355  
Woodstock, IL 60098  
(815) 334-4373

---

**From:** Paul Dulberg <[pdulberg@icloud.com](mailto:pdulberg@icloud.com)>  
**Sent:** Thursday, November 9, 2023 2:25 PM  
**To:** Stacey Collins <[SACollins@22ndcircuit.illinoiscourts.gov](mailto:SACollins@22ndcircuit.illinoiscourts.gov)>  
**Cc:** Judy Carlson <[JACarlson@22ndcircuit.illinoiscourts.gov](mailto:JACarlson@22ndcircuit.illinoiscourts.gov)>  
**Subject:** [EXTERNAL] Fwd: 17 LA 377

Dear Stacy Collins,

Please provide confirmation that you filed all of the attached PDF's of transcripts you created and sent to me with the circuit clerk on or about March 24, 2022.

If you need copies of the payment receipts for producing these reports of proceedings let me know and I will forward them to you.

Thank you,

Paul

Paul Dulberg  
[pdulberg@icloud.com](mailto:pdulberg@icloud.com)

Begin forwarded message:

**From:** Stacey Collins <[SACollins@22ndcircuit.illinoiscourts.gov](mailto:SACollins@22ndcircuit.illinoiscourts.gov)>  
**Subject:** 17 LA 377  
**Date:** March 24, 2022 at 2:22:58 PM CDT  
**To:** Paul Dulberg <[pdulberg@icloud.com](mailto:pdulberg@icloud.com)>

Mr. Dulberg,

Attached please find PDF Reports of Proceedings for the following dates in the above-referenced case:

01 10 18  
02 27 18  
09 12 18  
02 10 21  
04 01 21

Stacey A. Collins  
Official Court Reporter  
22<sup>nd</sup> Judicial Circuit  
Woodstock, IL

**CAUTION:** This email originated from outside of the County network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

While mismatches between the actual SENDER field and the FROM field are common. It is also a common spoofing tactic. For additional reference, this email was actually sent from [pdulberg@icloud.com](mailto:pdulberg@icloud.com)

If you have any questions about the legitimacy of this email, please call the helpdesk at extension 4828.

LEGAL CONFIDENTIAL: The information in this e-mail and in any attachment contains information which is legally privileged. It is intended only for the attention and use of the named recipient. If you are not the intended recipient, you are not authorized to retain, disclose, copy or distribute the message and/or any of its attachments. If you received this e-mail in error, please notify Stacey A. Collins, CSR, and delete this message.

3 attachments



image001.jpg  
5K



image001.jpg  
5K

17 LA 377 TRANSCRIPTS FILED.pdf  
478K

Paul Dulberg <Paul\_Dulberg@comcast.net>  
To: Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>  
Cc: Tom Kost <tkost999@gmail.com>

Sat, Nov 18, 2023 at 9:09 AM

Mr Talarico,

Does this email request to the circuit clerk to correct/amend the record on appeal need to be forwarded to Flynn?

Rule 361. Motions in Reviewing Court

(e) Corrections. The clerk is authorized to make corrections in any document of a party to any pending case upon receipt of written request from that party together with proof that a copy of the request has been transmitted to all other parties.

Note: I have not received a response from the circuit clerk to the email request below.

Paul

Begin forwarded message:  
[Quoted text hidden]

LEGAL CONFIDENTIAL: The information in this e-mail and in any attachment contains information which is legally privileged. It is intended only for the attention and use of the named recipient. If you are not the intended recipient, you are not authorized to retain, disclose, copy or distribute the message and/or any of its attachments. If you received this e-mail in error, please notify Stacey A. Collins, CSR, and delete this message.

Begin forwarded message:

From: Judy Carlson <JACarlson@22ndcircuit.illinoiscourts.gov>  
Subject: RE: [EXTERNAL] Fwd: 17 LA 377  
Date: November 14, 2023 at 11:20:02 AM CST  
To: Paul Dulberg <pdulberg@icloud.com>

Good Morning, Mr. Dulberg,

The transcripts have been filed for 1-10-18 and 2-27-18.

Thank you,

Judy Carlson, CSR  
Official Court Reporter  
Court Reporting Services Supervisor  
2200 N. Seminary Ave. Suite 355  
Woodstock, IL 60098  
(815) 334-4373

From: Paul Dulberg <pdulberg@icloud.com>  
Sent: Thursday, November 9, 2023 2:25 PM  
To: Stacey Collins <SACollins@22ndcircuit.illinoiscourts.gov>  
Cc: Judy Carlson <JACarlson@22ndcircuit.illinoiscourts.gov>  
Subject: [EXTERNAL] Fwd: 17 LA 377

Dear Stacy Collins,

Please provide confirmation that you filed all of the attached PDF's of transcripts you created and sent to me with the circuit clerk on or about March 24, 2022.

If you need copies of the payment receipts for producing these reports of proceedings let me know and I will forward them to you.

Thank you,  
Paul

Paul Dulberg  
[pdulberg@icloud.com](mailto:pdulberg@icloud.com)

Begin forwarded message:

From: Stacey Collins <SACollins@22ndcircuit.illinoiscourts.gov>  
Subject: 17 LA 377  
Date: March 24, 2022 at 2:22:58 PM CDT  
To: Paul Dulberg <pdulberg@icloud.com>

Mr. Dulberg,

Attached please find PDF Reports of Proceedings for the following dates in the above-referenced case:  
01 10 18  
02 27 18

09 12 18  
02 10 21  
04 01 21

Stacey A. Collins  
Official Court Reporter  
22<sup>nd</sup> Judicial Circuit  
Woodstock, IL

**CAUTION:** This email originated from outside of the County network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

While mismatches between the actual SENDER field and the FROM field are common. It is also a common spoofing tactic. For additional reference, this email was actually sent from [pdulberg@icloud.com](mailto:pdulberg@icloud.com)

If you have any questions about the legitimacy of this email, please call the helpdesk at extension 4828.

LEGAL CONFIDENTIAL: The information in this e-mail and in any attachment contains information which is legally privileged. It is intended only for the attention and use of the named recipient. If you are not the intended recipient, you are not authorized to retain, disclose, copy or distribute the message and/or any of its attachments. If you received this e-mail in error, please notify Stacey A. Collins, CSR, and delete this message.

3 attachments



Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>  
To: Paul Dulberg <Paul\_Dulberg@comcast.net>  
Cc: Tom Kost <tkost999@gmail.com>

Sun, Nov 19, 2023 at 7:16 AM

Yes.

**From:** Paul Dulberg <Paul\_Dulberg@comcast.net>  
**Sent:** Saturday, November 18, 2023 9:09 AM  
**To:** Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>  
**Cc:** Tom Kost <tkost999@gmail.com>  
**Subject:** Fwd: 17LA377 ROP's now filed - update appellate records

[Quoted text hidden]



LEGAL CONFIDENTIAL: The information in this e-mail and in any attachment contains information which is legally privileged. It is intended only for the attention and use of the named recipient. If you are not the intended recipient, you are not authorized to retain, disclose, copy or distribute the message and/or any of its attachments. If you received this e-mail in error, please notify Stacey A. Collins, CSR, and delete this message.

Begin forwarded message:

**From:** Judy Carlson <JACarlson@22ndcircuit.illinoiscourts.gov>  
**Subject:** RE: [EXTERNAL] Fwd: 17 LA 377  
**Date:** November 14, 2023 at 11:20:02 AM CST  
**To:** Paul Dulberg <pdulberg@icloud.com>

Good Morning, Mr. Dulberg,

The transcripts have been filed for 1-10-18 and 2-27-18.

Thank you,  
[Quoted text hidden]



LEGAL CONFIDENTIAL: The information in this e-mail and in any attachment contains information which is legally privileged. It is intended only for the attention and use of the named recipient. If you are not the intended recipient, you are not authorized to retain, disclose, copy or distribute the message and/or any of its attachments. If you received this e-mail in error, please notify Stacey A. Collins, CSR, and delete this message.

Paul Dulberg <Paul\_Dulberg@comcast.net>  
To: Law Office Of Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>  
Cc: Tom Kost <tkost999@gmail.com>

Sun, Nov 19, 2023 at 7:55 AM

I take it your forwarding this or should I?

[Quoted text hidden]  
[Quoted text hidden]  
[Quoted text hidden]  
<image001.jpg>  
[Quoted text hidden]  
<image001.jpg>  
[Quoted text hidden]

Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>  
To: Paul Dulberg <Paul\_Dulberg@comcast.net>  
Cc: Tom Kost <tkost999@gmail.com>

Sun, Nov 19, 2023 at 8:31 AM

Can you please?

**From:** Paul Dulberg <Paul\_Dulberg@comcast.net>  
**Sent:** Sunday, November 19, 2023 7:55 AM  
**To:** Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>

Cc: Tom Kost <tkost999@gmail.com>  
Subject: Re: 17LA377 ROP's now filed - update appellate records

[Quoted text hidden]

Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>  
To: Paul Dulberg <pdulberg@icloud.com>, Paul Dulberg <Paul\_Dulberg@comcast.net>, T Kost <tkost999@gmail.com>

Tue, Nov 21, 2023 at 9:41 AM

From: Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>  
Sent: Tuesday, November 21, 2023 9:40 AM  
To: George K. Flynn <gflynn@karballaw.com>  
Cc: Michelle M. Blum <mblum@KARBALLAW.com>  
Subject: Re: 17LA377 ROP's now filed - update appellate records

Dear Counsel,

The point of sending you the entire string of emails between my client and the trial court administrative personnel was to alert you that the trial court clerk had obtained the two missing Reports of Proceeding from the Reporter who transcribed them but failed to file them in the trial court. They were thereafter filed as additiona' items in the trial court's record of the case as of November 9, 2023.

Because the trial court can, and desires to now supplement the record on Appeal to include these two missing Reports of Proceeding, as our expert had indicated in her affidavit that were missing, I sent the entire string of email to find out if you object to the Record on Appeal being supplement with them.

The trial clerk personnel indicated that she would supplement the Record on Appeal after you were notified of her intended actions and had an opportunity to object.

Sincerely  
Alphonse A. Talarico  
3128081410

From: George K. Flynn <gflynn@karballaw.com>  
Sent: Sunday, November 19, 2023 4:38 PM  
To: Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>  
Cc: Michelle M. Blum <mblum@KARBALLAW.com>  
Subject: Re: 17LA377 ROP's now filed - update appellate records

Counsel:

I am not aware of a filing at this time, only an inuendo.

Get Outlook for iOS

George K. Flynn

Karbal | Cohen | Economou | Silk | Dunne | LLC  
200 S. Wacker Drive  
Suite 2550  
Chicago, IL 60606  
P: (312) 431-3622  
F: (312) 431-3670  
E: gflynn@karballaw.com

**CONFIDENTIALITY NOTE:**

This electronic message transmission contains information from the law firm of Karbal, Cohen, Economou, Silk & Dunne, LLC, which may be confidential or privileged. The information is intended to be for the use of the individual or entity named above. If you are not the intended recipient, please immediately delete this e-mail and be aware that any disclosure, copying, distribution or use of the contents of this information is prohibited.

From: Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>  
Sent: Sunday, November 19, 2023 3:55:58 PM  
To: George K. Flynn <gflynn@karballaw.com>  
Subject: Re: 17LA377 ROP's now filed - update appellate records

Dear counsel,

I comprehend that you have a standing objection to any and all subsequent filing, including but not limited to this one.

Sincerely,  
Alphonse A. Talarico  
3128081410  
3126081410

From: George K. Flynn <gflynn@karballaw.com>  
Sent: Sunday, November 19, 2023 10:47 AM  
To: Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>, Michelle M. Blum <mblum@KARBALLAW.com>  
Subject: RE: 17LA377 ROP's now filed - update appellate records

Mr. Talarico:

The Court of Appeals has spoken multiple times as to your client's requests to "correct the record" and for additional extensions to file his brief. We object to any relief, including any additional requests for an extension. Moreover, the transcripts described below are immaterial to the appeal. We reserve all rights regarding any further delays or improper motion practice.

Regards,

George K. Flynn

Karbal | Cohen | Economou | Silk | Dunne | LLC  
200 S. Wacker Drive  
Suite 2550  
Chicago, IL 60606  
P: (312) 431-3622  
F: (312) 431-3670  
E: gflynn@karballaw.com

**CONFIDENTIALITY NOTE:**

This electronic message transmission contains information from the law firm of Karbal, Cohen, Economou, Silk & Dunne, LLC, which may be confidential or privileged. The information is intended to be for the use of the individual or entity named above. If you are not the intended recipient, please immediately delete this e-mail and be aware that any disclosure, copying, distribution or use of the contents of this information is prohibited.

From: Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>  
Sent: Sunday, November 19, 2023 8:40 AM  
To: George K. Flynn <gflynn@karballaw.com>; Michelle M. Blum <mblum@KARBALLAW.com>  
Subject: Fw: 17LA377 ROP's now filed - update appellate records

Dear Counsel,

I am forwarding this email string to alert you as to what is being done to correct the Record on Appeal.

Sincerely,  
Alphonse A. Talarico  
3128081410  
3126081410

[Quoted text hidden]

Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>  
To: "JACarlson@22ndcircuit.ilinoiscourts.gov" <JACarlson@22ndcircuit.ilinoiscourts.gov>, Paul Dulberg <pdulberg@icloud.com>, Paul Dulberg <Paul\_Dulberg@comcast.net>, T Kost <tkost999@gmail.com>

Wed, Nov 22, 2023 at 10:29 AM

Dear Judy Carlson, CSR.

Pursuant to your instructions to my Client Paul Dulberg, Attorney George K. Flynn has been made aware of your office's discovery of the two missing Report of Proceedings and your intent, after notification to Appellees, to supplement the Record on Appeal.

Mr. Flynn, as attorney for the Appellees objects to the supplementing of the Record on Appeal with the two missing, but now found, Report of Proceeding.

Please supplement the record on Appeal over Mr. Flynn's objection based upon said error by your office.

Sincerely,

Alphonse A. Talarico  
3128081410  
3128081410

---

**From:** Alphonse Talarico <[contact@lawofficeofalphonsetalarico.com](mailto:contact@lawofficeofalphonsetalarico.com)>  
**Sent:** Sunday, November 19, 2023 3:55 PM  
**To:** George K. Flynn <[gflynn@karballaw.com](mailto:gflynn@karballaw.com)>  
**Subject:** Re: 17LA377 ROP's now filed - update appellate records

[Quoted text hidden]

[Quoted text hidden]

---

**Paul Dulberg** <[Paul\\_Dulberg@comcast.net](mailto:Paul_Dulberg@comcast.net)>  
To: Law Office Of Alphonse Talarico <[contact@lawofficeofalphonsetalarico.com](mailto:contact@lawofficeofalphonsetalarico.com)>  
Cc: Tom Kost <[tkost99@gmail.com](mailto:tkost99@gmail.com)>

Wed, Nov 22, 2023 at 10:33 AM

Mr Talarico,


I believe this should be directed to the circuit clerk and maybe the appellate clerk since Judy Carlson already added it to the circuit clerks record and now we need the circuit clerk to amend the appellate clerks record.

Paul


[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

 P: (312) 431-3622

 F: (312) 431-3670

 E: [gflynn@karballaw.com](mailto:gflynn@karballaw.com)

[Quoted text hidden]