

## LOCKED-IN HIDDEN STRATEGY IN 17LA377

	GOOCH-WALCZYK	CLINTON-WILLIAMS	TALARICO
1) Mess up red (in <a href="#">this source</a> )	X		
2) Mess up blue (in <a href="#">this source</a> )	X	X	
3) Avoid green (bankruptcy)	X	X	X
4) Avoid defendant Gagnon's admission of negligence for Dulberg's injury	X	X	X
5) Single issue, single defendant claim (McGuire settlement, Mast)	X	X	X
6) Bury key evidence around single issue (Tilschner v Spangler <a href="#">here</a> and <a href="#">here</a> and <a href="#">here</a> )	X	X	X
7) Plant statements on record purportedly made by Dulberg ( <a href="#">here</a> and <a href="#">here</a> and <a href="#">here</a> )	X	X	X

In reaction to Dulberg informing Clinton-Williams of “overwhelming” and “smoking gun” evidence of intentional tort on July 8, 2019:

	CLINTON-WILLIAMS	TALARICO
8) Bury evidence of intentional tort around single issue ( <a href="#">here</a> )	X	X

In reaction to Talarico informing Dulberg that presiding Judge Meyer (who was also presiding Judge in underlying case 12LA178) was personal friends with defendant Popovich:

	TALARICO
9) Bury evidence of friendship between presiding Judge and defendant Popovich	X

In reaction to discovering forged signatures:

	TALARICO
10) Bury evidence of forgeries and evidence that at least 9 out of 10 depositions have no valid certification pages	X

In reaction to being informed of the sophisticated system of document and information suppression used by Clinton-Williams to target Dulberg and collaboration with opposing counsel:

	TALARICO
11) Bury evidence of a sophisticated system of document and information suppression used by Clinton-Williams against Dulberg and collaboration with opposing counsel Flynn	X