

**IN THE CIRCUIT COURT OF THE TWENTY-SECOND JUDICIAL CIRCUIT
McHENRY COUNTY, ILLINOIS**

PAUL R. DULBERG	)	
	)	
Plaintiff,	)	
	)	
vs.	)	
THOMAS W. GOOCH, SABINA SERSHON,	)	
EDWARD X. CLINTON, JULIA WILLIAMS,	)	
ALPHONSE TALARICO, GEORGE FLYNN,	)	CASE NO. 25LA360
THOMAS J. POPOVICH, HANS MAST, THE	)	
GOOCH FIRM, CLINTON LAW FIRM,	)	
LLC., LAW OFFICE OF ALPHONSE A.	)	
TALARICO	)	
	)	
Defendants,	)	

**PLAINTIFF’S RESPONSE IN OPPOSITION TO DEFENDANTS’ MOTION TO
QUASH SERVICE OF PROCESS (ALPHONSE TALARICO AND LAW OFFICE
OF ALPHONSE A. TALARICO)**

Plaintiff, PAUL R. DULBERG (pro se), files this Response in Opposition to the Motion to Quash Service of Process filed by Defendants ALPHONSE TALARICO and LAW OFFICE OF ALPHONSE A. TALARICO (collectively, “Moving Defendants”), pursuant to 735 ILCS 5/2-301, and states as follows:

I. RELEVANT RECORD FACTS

1. On December 8, 2025, summons issued in this matter for Moving Defendants using the address they hold out publicly and in litigation as their law office address: 707 Skokie Blvd., Suite 600, Northbrook, Illinois 60062. (**Exhibits ES-1¹, ES-2²**)
2. The Cook County Sheriff’s Affidavits/Returns of Service reflect that on December 11, 2025, at 10:21 a.m., service was made at 707 Skokie Blvd., Suite 600, Northbrook, Illinois, by serving Deborah Su (female, age 36), as follows:
 - a. As to ALPHONSE TALARICO (individual), the Sheriff marked “SUBSTITUTE SERVICE” and further reflects that a copy was mailed to Defendant at the same address

1 Attached as: EXHIBIT ES-1_2025-12-08_25LA360_0009_ALPHONSE TALARICO_SUM Additional Defendants_File Stamped.pdf

2 Attached as: EXHIBIT ES-2_2025-12-08_25LA360_0007_LAW OFFICE OF ALPHONSE A TALARICO_SUM Additional Defendants_File Stamped.pdf

on the date of service. **(Exhibit ES-3¹)**

b. As to LAW OFFICE OF ALPHONSE A. TALARICO, the Sheriff marked “CORP/CO/BUS/PART” and reflects service on Deborah Su at the same time and address. **(Exhibit ES-4²)**

3. On February 13, 2026, Moving Defendants filed their Motion to Quash, contending (among other things) that (i) Deborah Su is not authorized to accept service, and (ii) Alphonse Talarico “has never resided at or made 707 Skokie Blvd., Suite 600 ... his usual abode.” **(Exhibit ES-5³)**

4. Critically, Moving Defendants do NOT (and cannot) claim that 707 Skokie Blvd., Suite 600 is an “incorrect” address for the Law Office. To the contrary, Defendant Talarico’s own affidavit admits: “The Law Office of Alphonse A. Talarico has leased shared office space at 707 Skokie Blvd., Suite 600 in Northbrook, Illinois at all relevant times.” **(Exhibit ES-5³)**

5. Defendant Talarico has repeatedly used and held out this same 707 Skokie Blvd., Suite 600 address as his law office address in other litigation filings, including in Cook County Case No. 2022 L 010905, where his attorney signature block lists: “707 Skokie Boulevard suite 600, Northbrook, Illinois 60062” (with his phone number). **(Exhibit ES-6⁴)**

6. In that same Cook County matter, other counsel served filings on Talarico at: “707 Skokie Blvd., Suite 600, Northbrook, Illinois” and at Talarico’s law office email address—confirming that this is the address he uses, and expects others to use, to send him litigation papers and notices. **(Exhibit ES-7⁵)**

7. Defendant Talarico’s own current law office website is at the URL
<https://lawofficeofalphonsetalarico.com/>

The website currently lists the same office address for Talarico at: “707 Skokie Blvd. Suite 600, Northbrook, IL 60062.” **(Exhibit ES-8⁶)**

8. During Talarico’s entire representation of Dulberg during underlying legal malpractice case 2017

1 Attached as: EXHIBIT ES-3_2026-01-06_2025-12-11_25LA360_Affidavit-of-Service_Alphonse-Talarico_2025LA360.pdf

2 Attached as: EXHIBIT ES-4_2026-01-06_2025-12-11_25LA360_Affidavit-of-Service_Law-Office-Talarico_2025LA360.pdf

3 Attached as: EXHIBIT ES-5_2026-02-13_25LA360_0413_TALARICO_MOTION-TO-QUASH-SERVICE-OF-PROCESS_0413_OCR.pdf

4 Attached as: EXHIBIT ES-6_1-23-1142_2022L010905-CLR_Vol_1_of_2_230828_1352_7386A5DF_p51.pdf

5 Attached as: EXHIBIT ES-7_1-23-1142_2022L010905-CLR_Vol_1_of_2_230828_1352_7386A5DF_p665.pdf

6 Attached as: EXHIBIT ES-8_2026-03-06_Estate-Administration-Law-Office-of-Alphonse-A-Talarico.pdf

LA 000377 (around 38 months) Talarico represented the address 707 Skokie Blvd. Suite 600, Northbrook, IL as Talarico's physical office address. (**Exhibits ES-11¹, ES-12², ES-13³, ES-14⁴, ES-15⁵, ES-16⁶, ES-17⁷**)

9. There is evidence that:

- a. The entire email and telephone communications records between Dulberg and Talarico (over 38 months) provides many examples of Talarico representing 707 Skokie Blvd. Suite 600, Northbrook, IL as Talarico's physical address.
- b. Talarico informed Dulberg on multiple occasions that the building at 707 Skokie Blvd., Northbrook, IL was experiencing power outages and internet issues as reasons why Talarico could not perform actions on Dulberg's behalf.
- c. Talarico received over \$300,000 of payment from Dulberg delivered personally or sent by check to the 6th floor at address 707 Skokie Blvd. Suite 600, Northbrook, IL.
- d. Talarico's statement on February 13, 2026 in his Motion to Quash is the first time in any court or communications record between Dulberg and Talarico that Talarico (after having been retained by Dulberg for over 38 months) informed Dulberg that the address 707 Skokie Blvd. Suite 600, Northbrook, IL is a virtual office.

10. After Moving Defendants filed their Motion to Quash, Dulberg additionally completed personal service on Defendant ALPHONSE TALARICO on February 24, 2026 at 4:14 p.m. at 285 Linden Ave., Glencoe, Illinois 60022, as reflected in the filed Affidavit of Service. (**Exhibit ES-9⁸**)

11. The process server reported:

"2/23/2026 2:55 pm Spoke with neighbor who confirmed "Al" resides, and indicated the black Lexus in driveway was his. IL license plate CV 56779. No answer despite knocking loudly 4 or 5 times."

"2/24/2026 4:14 pm I saw the defendant's car backing up as I approached, and followed him. I served him in his car around the corner from his house, near the Robert Everly Wildflower Sanctuary, the closest address was 379 Jackson. I confirmed he was Mr. Talarico, who, after serving him, announced he was a lawyer and vehemently questioned the validity of the service immediately." (**Exhibits ES-9⁷, ES-10⁹**)

1 Attached as: EXHIBIT ES-11_2-23-0072_2017LA000377-CLR_Vol_1_of_2_230421_1627_D4CDE198_p483.pdf

2 Attached as: EXHIBIT ES-12_2-23-0072_2017LA000377-CLR_Vol_1_of_2_230421_1627_D4CDE198_p534.pdf

3 Attached as: EXHIBIT ES-13_2-23-0072_2017LA000377-CLR_Vol_1_of_2_230421_1627_D4CDE198_p815.pdf

4 Attached as: EXHIBIT ES-14_2-23-0072_2017LA000377-CLR_Vol_1_of_2_230421_1627_D4CDE198_p816-817.pdf

5 Attached as: EXHIBIT ES-15_2-23-0072_2017LA000377-CLR_Vol_1_of_2_230421_1627_D4CDE198_p820.pdf

6 Attached as: EXHIBIT ES-16_2-23-0072_2017LA000377-CLR_Vol_1_of_2_230421_1627_D4CDE198_p825.pdf

7 Attached as: EXHIBIT ES-17_2-23-0072_2017LA000377-CLR_Vol_1_of_2_230421_1627_D4CDE198_p841.pdf

8 Attached as: EXHIBIT ES-9_2026-02-25_25LA360_0000_Affidavit of Service_Alphonse Talarico_MN_2026-02-25.pdf

9 Attached as: EXHIBIT ES-10_2026-02-20-25_RECV_Re Personal Service Completed Alphonse Talarico Case No 25LA360.pdf

Talarico acted as if he was actively avoiding service and “announced he was a lawyer and vehemently questioned the validity of the service immediately”.

II. ARGUMENT

A. Legal standard: a Sheriff’s return is prima facie proof of service, and the movant bears the burden.

12. A return of service by a sheriff is prima facie evidence of valid service. The party challenging service bears the burden to rebut the return with competent proof sufficient to overcome the presumption and to impeach the return by clear and satisfactory evidence.

13. In assessing a motion to quash under 735 ILCS 5/2-301, the Court may consider affidavits; however, conclusory, self-serving denials—particularly denials that conflict with the movant’s own admissions and public representations—do not constitute “clear and satisfactory” impeachment of a Sheriff’s return.

B. Moving Defendants’ “not my abode / not authorized” theory is an attempt to exploit a shared-office setup while simultaneously using 707 Skokie Blvd., Suite 600 as their official office address.

14. Moving Defendants’ Motion attempts to cast 707 Skokie Blvd., Suite 600 as a “shared office space” to defeat service. But Defendant Talarico simultaneously admits under certification that his Law Office has leased and used that exact location “at all relevant times.” (**Exhibit ES-5¹, p.7**)

15. The record also shows Defendant Talarico has publicly and repeatedly held out 707 Skokie Blvd., Suite 600 as his law office address—on his law office website and in litigation filings. (**Exhibits ES-6², ES-7³, ES-8⁴, ES-11⁵, ES-12⁶, ES-13⁷, ES-14⁸, ES-15⁹, ES-16¹⁰, ES-17¹¹**)

16. Dulberg served Defendants at the address Defendants themselves use as their law office/registered business address in practice and in litigation. The Motion to Quash is therefore not a good-

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9 Attached as: EXHIBIT ES-15_2-23-0072_2017LA000377-CLR_Vol_1_of_2_230421_1627_D4CDE198_p820.pdf

10 Attached as: EXHIBIT ES-16_2-23-0072_2017LA000377-CLR_Vol_1_of_2_230421_1627_D4CDE198_p825.pdf

11 Attached as: EXHIBIT ES-17_2-23-0072_2017LA000377-CLR_Vol_1_of_2_230421_1627_D4CDE198_p841.pdf

faith “wrong address” motion; it is a technical attack designed to create a service “shell game” in which Defendants (i) use 707 Skokie Blvd., Suite 600 to conduct business, market legal services, and receive litigation communications, but then (ii) disavow that same address when service is directed there.

C. The Motion to Quash should be denied (or, at minimum, denied in practical effect) because the record does not justify quashing service in a way that delays the case.

17. As to ALPHONSE TALARICO (individual): the Sheriff’s return reflects substitute service at Defendant’s “usual place of abode” and mailing on the date of service. **(Exhibit ES-3¹)** Defendant’s affidavit asserts he has not resided there, but does not provide the kind of objective, corroborated proof necessary to clearly and satisfactorily impeach a Sheriff’s sworn return, especially where Defendant admits he leased/used that location as his law office “at all relevant times” and publicly holds it out as his address. **(Exhibits ES-5², ES-6³, ES-8⁴, ES-11⁵, ES-12⁶, ES-13⁷, ES-14⁸, ES-15⁹, ES-16¹⁰, ES-17¹¹)**

18. As to the LAW OFFICE OF ALPHONSE A. TALARICO: Defendant admits the Law Office leased and used that location during all relevant times. **(Exhibit ES-5¹², p.7)** The Sheriff’s return reflects business service at that address. **(Exhibit ES-4¹³)** Moving Defendants’ position effectively asks the Court to hold that a business can operate from a shared office, hold that address out publicly and in litigation, yet be immune from service made at that address unless the Plaintiff can first litigate Regus’s internal staffing and authorization structure. The Court should reject that outcome as inconsistent with the purposes of service and orderly case administration.

19. At an absolute minimum, if the Court has any concern about the December 11 service attempts,

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13 Attached as: EXHIBIT ES-4_2026-01-06_2025-12-11_25LA360_Affidavit-of-Service_Law-Office-Talarico_2025LA360.pdf

the Court should not grant relief that delays the matter on a purely technical dispute. Defendant Talarico was personally served on February 24, 2026. **(Exhibit ES-9¹)** Accordingly, the Court should:

- a. deny the Motion to Quash; or
- b. deny the Motion as moot as to Defendant Talarico; or
- c. alternatively, treat service on Defendant Talarico as effective as of February 24, 2026 and enter a case-management order setting a date certain for appearance and responsive pleading so the matter proceeds on the merits; and
- d. as to the “Law Office” defendant, deny the Motion or, if the Court deems any additional step necessary, grant Dulberg prompt procedural relief (including leave to re-issue process and/or clarify the capacity in which Defendant Talarico/Law Office is sued), rather than quashing service in a manner that rewards gamesmanship and unnecessarily delays the case.

III. RELIEF REQUESTED

WHEREFORE, Dulberg respectfully request that this Court:

- A. Denying Moving Defendants’ Motion to Quash Service of Process; and
- B. SET a date certain for appearance and responsive pleading (or, alternatively, deem service effective as of February 24, 2026 as to Defendant Alphonse Talarico and set deadlines accordingly); and
- C. Granting such other and further relief as the Court deems just.

Submitted by: /s/ Paul R. Dulberg
Paul R. Dulberg (pro se)
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VERIFICATION BY CERTIFICATION PURSUANT TO SECTION 1-109

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument and its exhibits are true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

/s/ Paul R. Dulberg
Paul R. Dulberg

Date: **3/6/2026**

1 Attached as: EXHIBIT ES-9_2026-02-25_25LA360_0000_Affidavit of Service_Alphonse Talarico_MN_2026-02-25.pdf

CERTIFICATE OF SERVICE

I certify that on **3/6/2026**, I served this document on all counsel/parties of record via eFileIL/EFSP electronic service to the extent available, and by email to any party not on eFile service.

/s/ Paul R. Dulberg

Date: **3/6/2026**