

From: Office Office office@goochfirm.com 
Subject: Dulberg vs. Law Offices of Thomas J. Popovich, P.C., et a.
Date: August 31, 2018 at 9:02 AM
To: me pdulberg@comcast.net
Cc: Thomas W. Gooch III gooch@goochfirm.com, Sabina Walczyk swalczyk@goochfirm.com, Nikki nikki@goochfirm.com

Dear Mr. Dulberg:

Attached please find the Defendants Reply in Support of their Motion to Dismiss along with their letter to the Judge.

Please note there is a hearing on their Motion to Dismiss set for September 12, 2018 at 10:00 a.m. We will keep you advised of what transpires that day in Court.

If you have any questions, please let me know.

Melissa J. Podgorski
Paralegal
The Gooch Firm
209 South Main Street
Wauconda, Illinois 60084
(847) 526-0110 (phone)
(847) 526-0603 (fax)

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Letter to Judge
Meyer...ed.pdf

From: me pdulberg@comcast.net 
Subject: Fwd: Dulberg vs. Law Offices of Thomas J. Popovich, P.C., et a.
Date: August 31, 2018 at 9:12 AM
To: T Kost tkost999@gmail.com



----- Forwarded Message -----

Subject: Dulberg vs. Law Offices of Thomas J. Popovich, P.C., et a.

Date: Fri, 31 Aug 2018 14:00:13 +0000

From: Office Office <office@goochfirm.com>

To: me <pdulberg@comcast.net>

CC: Thomas W. Gooch III <gooch@goochfirm.com>, Sabina Walczyk <swalczyk@goochfirm.com>, Nikki <nikki@goochfirm.com>

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Letter to Judge

Meyer...ed.pdf

From: me pdulberg@comcast.net
Subject: Re: Dulberg vs. Law Offices of Thomas J. Popovich, P.C., et a.
Date: August 31, 2018 at 9:21 AM
To: Office Office office@goochfirm.com
Cc: Thomas W. Gooch III gooch@goochfirm.com, Sabina Walczyk swalczyk@goochfirm.com, Nikki nikki@goochfirm.com



Thank you for the copy.

My blood boils when I read their responses so I'll need the weekend to cool off and look at this objectively.

Thank you again,
Paul

On 8/31/2018 9:00 AM, Office Office wrote:

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From: Office Office <office@goochfirm.com>
Subject: RE: Dulberg vs. Law Offices of Thomas J. Popovich, P.C., et a.
Date: August 31, 2018 at 9:46 AM
To: me <pdulberg@comcast.net>

I am sure. Im sorry! Don't let them ruin your weekend! Enjoy!

Melissa J. Podgorski
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Sent: Friday, August 31, 2018 9:21 AM
To: Office Office <office@goochfirm.com>
Cc: Thomas W. Gooch III <gooch@goochfirm.com>; Sabina Walczyk <swalczyk@goochfirm.com>; Nikki <nikki@goochfirm.com>
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From: Paul Dulberg pdulberg@comcast.net 
Subject: Re: Dulberg vs. Law Offices of Thomas J. Popovich, P.C., et a.
Date: September 7, 2018 at 10:06 AM
To: Office Office office@goochfirm.com
Cc: Thomas W. Gooch III gooch@goochfirm.com, Sabina Walczyk swalczyk@goochfirm.com, Nikki nikki@goochfirm.com



Please find the attached comments_on_Letter_to_Judge_Meyer.txt file

Will see you on Monday to discuss

Thanks,
Paul

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comments_on_L
etter_t...eyer.txt

4 KB

From: Paul Dulberg pdulberg@comcast.net 
Subject: Fwd: Re: Dulberg vs. Law Offices of Thomas J. Popovich, P.C., et a.
Date: September 7, 2018 at 10:07 AM
To: tkost999@gmail.com



----- Forwarded Message -----

Subject: Re: Dulberg vs. Law Offices of Thomas J. Popovich, P.C., et a.

Date: Fri, 7 Sep 2018 10:06:08 -0500

From: Paul Dulberg [<pdulberg@comcast.net>](mailto:pdulberg@comcast.net)

To: Office Office [<office@goochfirm.com>](mailto:office@goochfirm.com)

CC: Thomas W. Gooch III [<gooch@goochfirm.com>](mailto:gooch@goochfirm.com), Sabina Walczyk [<swalczyk@goochfirm.com>](mailto:swalczyk@goochfirm.com), Nikki [<nikki@goochfirm.com>](mailto:nikki@goochfirm.com)

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|



comments_on_L
etter_t...eyer.txt

4 KB

From: Paul Dulberg pdulberg@comcast.net
Subject: Re: Dulberg vs. Law Offices of Thomas J. Popovich, P.C., et a.
Date: September 12, 2018 at 12:33 PM
To: Office Office office@goochfirm.com
Cc: Thomas W. Gooch III gooch@goochfirm.com, Sabina Walczyk swalczyk@goochfirm.com, Nikki nikki@goochfirm.com



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From: Paul Dulberg pdulberg@comcast.net
Subject: Fwd: Re: Dulberg vs. Law Offices of Thomas J. Popovich, P.C., et a.
Date: September 12, 2018 at 12:34 PM
To: tkost999@gmail.com



----- Forwarded Message -----

Subject: Re: Dulberg vs. Law Offices of Thomas J. Popovich, P.C., et a.

Date: Wed, 12 Sep 2018 12:33:27 -0500

From: Paul Dulberg [<pdulberg@comcast.net>](mailto:pdulberg@comcast.net)

To: Office Office [<office@goochfirm.com>](mailto:office@goochfirm.com)

CC: Thomas W. Gooch III [<gooch@goochfirm.com>](mailto:gooch@goochfirm.com), Sabina Walczyk [<swalczyk@goochfirm.com>](mailto:swalczyk@goochfirm.com), Nikki [<nikki@goochfirm.com>](mailto:nikki@goochfirm.com)

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From: Paul Dulberg pdulberg@comcast.net
Subject: Re: Dulberg vs. Law Offices of Thomas J. Popovich, P.C., et a.
Date: September 19, 2018 at 9:06 AM
To: Office Office office@goochfirm.com
Cc: Thomas W. Gooch III gooch@goochfirm.com, Sabina Walczyk swalczyk@goochfirm.com, Nikki nikki@goochfirm.com



Hi Tom, Sabina,

May I get the digital copy of the court order and transcript from 9/12/2018?

Thanks,
Paul
847-497-4250

On 9/12/2018 12:33 PM, Paul Dulberg wrote:

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From: Paul Dulberg pdulberg@comcast.net
Subject: Fwd: Re: Dulberg vs. Law Offices of Thomas J. Popovich, P.C., et a.
Date: September 19, 2018 at 9:07 AM
To: tkost999@gmail.com



----- Forwarded Message -----

Subject: Re: Dulberg vs. Law Offices of Thomas J. Popovich, P.C., et a.

Date: Wed, 19 Sep 2018 09:06:52 -0500

From: Paul Dulberg [<pdulberg@comcast.net>](mailto:pdulberg@comcast.net)

To: Office Office [<office@goochfirm.com>](mailto:office@goochfirm.com)

CC: Thomas W. Gooch III [<gooch@goochfirm.com>](mailto:gooch@goochfirm.com), Sabina Walczyk [<swalczyk@goochfirm.com>](mailto:swalczyk@goochfirm.com), Nikki [<nikki@goochfirm.com>](mailto:nikki@goochfirm.com)

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From: Sabina Walczyk swalczyk@goochfirm.com 
Subject: RE: Dulberg vs. Law Offices of Thomas J. Popovich, P.C., et a.
Date: September 19, 2018 at 11:52 AM
To: Paul Dulberg pdulberg@comcast.net, Office Office office@goochfirm.com
Cc: Thomas W. Gooch III gooch@goochfirm.com, Nikki nikki@goochfirm.com

Hi Paul we are still waiting for the transcript but attached is the Order.

Sabina D. Walczyk
Associate Attorney
The Gooch Firm
209 South Main Street
Wauconda, Illinois 60084
(847) 526-0110 (phone)
(847) 526-0603 (fax)

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12
IN THE CIRCUIT COURT OF THE 22ND JUDICIAL CIRCUIT

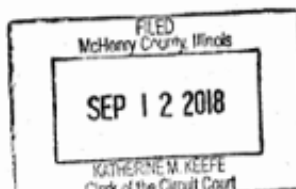
STATE OF ILLINOIS)
) ss
COUNTY OF MCHENRY)

GEN. NO. 17 LA 377
☒ Jury ☐ Non-Jury

Dulberg

VS.

Papovich + Most



Date: 9-12-18

Plaintiff's
Attorney

Selin. Wolczyk

Defendant's
Attorney

George Flynn

ORDER

This matter coming to be heard on Defendants' Motion to Dismiss Plaintiff's First Amended Complaint, it is hereby ordered:

1) Defendants' motion is granted as more fully described on the record and below.

2) Paragraphs ~~21~~ 31(b), (c), (f), (g), (h), (i), (k), (l), (m), (n), and (o) are stricken as conclusions or being redundant.

3) Plaintiff is granted leave to reply by October 10, 2018. Defendants' to file a responsive pleading by November 7, 2018.

4) Status hearing on November 13, 2018 at 9:00 a.m.

Prepared by: George Flynn

Attorney for: Defendants

Attorney Registration No.: 6239349

Judge:

From: Thomas W. Gooch III gooch@goochfirm.com
Subject: RE: Dulberg vs. Law Offices of Thomas J. Popovich, P.C., et a.
Date: September 19, 2018 at 12:01 PM
To: Paul Dulberg pdulberg@comcast.net, Office Office office@goochfirm.com
Cc: Sabina Walczyk swalczyk@goochfirm.com, Nikki nikki@goochfirm.com

Court order is not as problem, get it to you today. The transcript is expensive and needs to be ordered from the court which we can do but I believe is a waste of money pls advise if you wish me to order it. We are preparing the amended complaint. You need to realize it is not at all unusual to have a complaint struck and dismissed without prejudice 2 or 3 times even in a case, its based on the law and the need to say more.

In any event I am working on an amended complaint now and intend to file early. In the meantime we are going to proceed with discovery to keep things moving.

From: Paul Dulberg <pdulberg@comcast.net>
Sent: Wednesday, September 19, 2018 9:07 AM
To: Office Office <office@goochfirm.com>
Cc: Thomas W. Gooch III <gooch@goochfirm.com>; Sabina Walczyk <swalczyk@goochfirm.com>; Nikki <nikki@goochfirm.com>
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From: Paul Dulberg pdulberg@comcast.net
Subject: Re: Dulberg vs. Law Offices of Thomas J. Popovich, P.C., et a.
Date: September 19, 2018 at 2:05 PM
To: Thomas W. Gooch III gooch@goochfirm.com



Thanks Tom,

I'm willing to pay for the transcript.
It details which parts of the order were struck down for redundancy and which were considered conclusions.
it should help you in writing the amended complaint.

Thank You again,
Paul

On 9/19/2018 11:58 AM, Thomas W. Gooch III wrote:

Court order is not as problem, get it to you today. The transcript is expensive and needs to be ordered from the court which we can do but I believe is a waste of money pls advise if you wish me to order it. We are preparing the amended complaint. You need to realize it is not at all unusual to have a complaint struck and dismissed without prejudice 2 or 3 times even in a case, its based on the law and the need to say more.

In any event I am working on an amended complaint now and intend to file early. In the meantime we are going to proceed with discovery to keep things moving.

From: Paul Dulberg pdulberg@comcast.net
Sent: Wednesday, September 19, 2018 9:07 AM
To: Office Office office@goochfirm.com
Cc: Thomas W. Gooch III gooch@goochfirm.com; Sabina Walczyk swalczyk@goochfirm.com; Nikki nikki@goochfirm.com
Subject: Re: Dulberg vs. Law Offices of Thomas J. Popovich, P.C., et a.

Hi Tom, Sabina,

May I get the digital copy of the court order and transcript from 9/12/2018?

Thanks,
Paul
847-497-4250

On 9/12/2018 12:33 PM, Paul Dulberg wrote:

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Hope nothing bad happened to delay you and that everyone is okay.

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If you have any questions, please let me know.

Melissa J. Podgorski
Paralegal
The Gooch Firm
209 South Main Street
Wauconda, Illinois 60084
(847) 526-0110 (phone)
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From: Paul Dulberg pdulberg@comcast.net
Subject: Fwd: Re: Dulberg vs. Law Offices of Thomas J. Popovich, P.C., et a.
Date: September 19, 2018 at 2:06 PM
To: tkost999@gmail.com



----- Forwarded Message -----

Subject: Re: Dulberg vs. Law Offices of Thomas J. Popovich, P.C., et a.
Date: Wed, 19 Sep 2018 14:05:44 -0500
From: Paul Dulberg pdulberg@comcast.net
To: Thomas W. Gooch III gooch@goochfirm.com

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Date: September 19, 2018 at 2:06 PM
To: Sabina Walczyk swalczyk@goochfirm.com



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On 9/19/2018 11:52 AM, Sabina Walczyk wrote:

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Sabina D. Walczyk
Associate Attorney
The Gooch Firm
209 South Main Street
Wauconda, Illinois 60084
(847) 526-0110 (phone)
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Subject: Fwd: Re: Dulberg vs. Law Offices of Thomas J. Popovich, P.C., et a.
Date: September 19, 2018 at 2:07 PM
To: tkost999@gmail.com



----- Forwarded Message -----

Subject: Re: Dulberg vs. Law Offices of Thomas J. Popovich, P.C., et a.
Date: Wed, 19 Sep 2018 14:06:41 -0500
From: Paul Dulberg pdulberg@comcast.net
To: Sabina Walczyk swalczyk@goochfirm.com

Thank You

On 9/19/2018 11:52 AM, Sabina Walczyk wrote:

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Sabina D. Walczyk
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From: Paul Dulberg pdulberg@comcast.net 
Subject: Fwd: RE: Dulberg vs. Law Offices of Thomas J. Popovich, P.C., et a.
Date: September 20, 2018 at 10:15 AM
To: tkost999@gmail.com



----- Forwarded Message -----

Subject: RE: Dulberg vs. Law Offices of Thomas J. Popovich, P.C., et a.
Date: Wed, 19 Sep 2018 16:52:11 +0000
From: Sabina Walczyk [<swalczyk@goochfirm.com>](mailto:swalczyk@goochfirm.com)
To: Paul Dulberg [<pdulberg@comcast.net>](mailto:pdulberg@comcast.net), Office Office [<office@goochfirm.com>](mailto:office@goochfirm.com)
CC: Thomas W. Gooch III [<gooch@goochfirm.com>](mailto:gooch@goochfirm.com), Nikki [<nikki@goochfirm.com>](mailto:nikki@goochfirm.com)

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Sabina D. Walczyk
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From: Paul Dulberg [<pdulberg@comcast.net>](mailto:pdulberg@comcast.net)
Sent: Wednesday, September 19, 2018 9:07 AM
To: Office Office [<office@goochfirm.com>](mailto:office@goochfirm.com)
Cc: Thomas W. Gooch III [<gooch@goochfirm.com>](mailto:gooch@goochfirm.com); Sabina Walczyk [<swalczyk@goochfirm.com>](mailto:swalczyk@goochfirm.com); Nikki [<nikki@goochfirm.com>](mailto:nikki@goochfirm.com)
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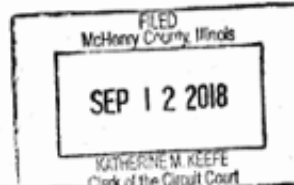
IN THE CIRCUIT COURT OF THE 22ND JUDICIAL CIRCUIT

STATE OF ILLINOIS)
) SS
COUNTY OF MCHENRY)

GEN. NO. 17 LA 377
☒ Jury ☐ Non-Jury

Duberg
Papovich + Most

VS.



Date: 9-12-18

Plaintiff's Attorney Sabin Wolczyk

Defendant's Attorney George Flynn

ORDER

This matter coming to be heard on Defendants' Motion to Dismiss Plaintiff's First Amended Complaint, it is hereby ordered:

- 1) Defendants' motion is granted as more fully described on the record and below.
- 2) Paragraphs ~~31~~ 31(b), (c), (f), (g), (h), (i), (k), (l), (m), (n), and (o) are stricken as conclusions or being redundant.
- 3) Plaintiff is granted leave to reply by October 10, 2018. Defendants' to file a responsive pleading by November 7, 2018.
- 4) Status hearing on November 13, 2018 at 9:00 a.m.

Prepared by: George Flynn

Attorney for: Defendants

Attorney Registration No.: 6239349

Judge: [Signature]

From: T Kost tkost999@gmail.com 
Subject: from tom
Date: October 2, 2018 at 7:32 AM
To: me pdulberg@comcast.net

see attached



second_amende
d_complaint.txt

From: Paul Dulberg pdulberg@comcast.net 

Subject: Fwd: from tom

Date: October 2, 2018 at 9:11 AM

To: Thomas W. Gooch III gooch@goochfirm.com, Sabina Walczyk swalczyk@goochfirm.com, Office Office office@goochfirm.com, Nikki nikki@goochfirm.com



Hi Tom and Sabina,
Please see the attached file.
contact me with any questions.
Thank you,
Paul

----- Forwarded Message -----

Subject:from tom

Date:Tue, 2 Oct 2018 07:32:00 -0500

From:T Kost <tkost999@gmail.com>

To:me <pdulberg@comcast.net>

see attached



second_amende
d_complaint.txt

18 KB

From: Thomas W. Gooch III gooch@goochfirm.com

Subject: RE: from tom

Date: October 2, 2018 at 1:06 PM

To: Paul Dulberg pdulberg@comcast.net, Sabina Walczyk swalczyk@goochfirm.com, Office Office office@goochfirm.com, Nikki nikki@goochfirm.com

Mr. Duhlberg;

I have your attachment and am deeply offended by it.

I more upset over being ordered to call you today. I am preparing for trial and frankly don't have time to read or comment on your attempts to educate me on what legal malpractice is all about, I particularly don't have time to read outdated cases on the elements of a legal malpractice case, nor do I have any intention of quoting the law you sent to me.

You understand full well I'm sure that I have been doing this for a very long time, if I need help on understanding the law I will get from someone who knows how to do legal research, you and your brother don't.

If I have anymore of this authoritative comments or instructions I will have to give particular thought to withdrawing my appearance and letting you represent your self or find someone else, understand this is not an empty threat, I will tolerate any more of this. If I need a factual question answered and I'm sure I will in the course of this litigation then I will ask you but kindly stop with rudimentary research. The Google searches of you and your brother are not replacements for my law license.

I generally don't have a problem with relatives helping out and being involved just so long as the client understands that the relatives involvement may waive the attorney client privilege. However at this point your brother has become more the problem then helpful. While I can not prevent him from injecting himself into your case through you, I am no longer willing to have him present at conferences or communicate directly with me.

At this point with everything I have going and the attitude you are displaying I have serious doubts as continuing to represent you. Kindly do not communicate with my staff on the telephone in the manner you chose today

Sincerely

Thomas W Gooch
The Gooch Firm
209 S. Main Street
Wauconda, Illinois 60084
847.526.0110
Gooch@goochfirm.com
WWW.Goochfirm.com

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Circular 230 Disclosure: Pursuant to recently-enacted U.S. Treasury Department regulations, we are now required to advise you that, unless otherwise expressly indicated, any federal tax advice contained in this communication, including attachments and enclosures, is not intended or written to be used, and may not be used, for the purpose of (i) avoiding tax-related penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any tax-related matters addressed herein.

From: Paul Dulberg <pdulberg@comcast.net>

Sent: Tuesday, October 02, 2018 9:11 AM

To: Thomas W. Gooch III <gooch@goochfirm.com>; Sabina Walczyk <swalczyk@goochfirm.com>; Office Office <office@goochfirm.com>; Nikki <nikki@goochfirm.com>

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To:me <pdulberg@comcast.net>

see attached

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Subject: Fwd: RE: from tom
Date: October 2, 2018 at 2:06 PM
To: tkost999@gmail.com



----- Forwarded Message -----

Subject: RE: from tom

Date: Tue, 2 Oct 2018 18:06:07 +0000

From: Thomas W. Gooch III <gooch@goochfirm.com>

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Gooch@goochfirm.com

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Sent: Tuesday, October 02, 2018 9:11 AM

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From:T Kost <tkost999@gmail.com>

To:me <pdulberg@comcast.net>

see attached

From: Paul Dulberg pdulberg@comcast.net 

Subject: Re: from tom

Date: October 3, 2018 at 11:02 AM

To: Thomas W. Gooch III gooch@goochfirm.com, Sabina Walczyk swalczyk@goochfirm.com, Office Office office@goochfirm.com, Nikki nikki@goochfirm.com



Hello Tom and Sabina,

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Sent: Tuesday, October 02, 2018 9:11 AM

To: Thomas W. Gooch III <gooch@goochfirm.com>; Sabina Walczyk <swalczyk@goochfirm.com>; Office Office <office@goochfirm.com>; Nikki <nikki@goochfirm.com>

Subject: Fwd: from tom

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Subject:from tom

Date:Tue, 2 Oct 2018 07:32:00 -0500

From:T Kost <tkost999@gmail.com>

To:me <pdulberg@comcast.net>

see attached



second_amende
d_complaint.txt

18 KB

From: Paul Dulberg pdulberg@comcast.net 
Subject: Fwd: Re: from tom
Date: October 3, 2018 at 12:51 PM
To: tkost999@gmail.com



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Subject: Re: from tom

Date: Wed, 3 Oct 2018 11:02:09 -0500

From: Paul Dulberg <pdulberg@comcast.net>

To: Thomas W. Gooch III <ggooch@goochfirm.com>, Sabina Walczyk <swalczyk@goochfirm.com>, Office
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From: **Paul Dulberg** pdulberg@comcast.net
Subject: Fwd: RE: from tom
Date: October 3, 2018 at 1:15 PM
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Date: Wed, 3 Oct 2018 17:54:40 +0000
From: Thomas W. Gooch III <gooch@goochfirm.com>
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To: Mike Mcartor mike937031@gmail.com



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At this point with everything I have going and the attitude you are displaying I have serious doubts as continuing to represent you. Kindly do not communicate with my staff on the telephone in the manner you chose today

Sincerely

Thomas W Gooch
The Gooch Firm
209 S. Main Street
Wauconda, Illinois 60084
847.526.0110
Gooch@goochfirm.com

WWW.Goochfirm.com

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From: Paul Dulberg <pdulberg@comcast.net>

Sent: Tuesday, October 02, 2018 9:11 AM

To: Thomas W. Gooch III <gooch@goochfirm.com>; Sabina Walczyk <swalczyk@goochfirm.com>; Office Office <office@goochfirm.com>; Nikki <nikki@goochfirm.com>

Subject: Fwd: from tom

Hi Tom and Sabina,
Please see the attached file.
contact me with any questions.
Thank you,
Paul

----- Forwarded Message -----

Subject:from tom

Date:Tue, 2 Oct 2018 07:32:00 -0500

From:T Kost <tkost999@gmail.com>

To:me <pdulberg@comcast.net>

see attached



second amende

d_complaint.txt

18 KB

From: Paul Dulberg pdulberg@comcast.net
Subject: Fwd: RE: from tom
Date: October 8, 2018 at 12:51 PM
To: paul_dulberg@comcast.net



----- Forwarded Message -----

Subject: RE: from tom

Date: Tue, 2 Oct 2018 18:06:07 +0000

From: Thomas W. Gooch III <gooch@goochfirm.com>

To: Paul Dulberg <pdulberg@comcast.net>, Sabina Walczyk <swalczyk@goochfirm.com>, Office Office <office@goochfirm.com>, Nikki <nikki@goochfirm.com>

Mr. Duhlberg;

I have your attachment and am deeply offended by it.

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Date:Tue, 2 Oct 2018 07:32:00 -0500

From:T Kost <tkost999@gmail.com>

To:me <pdulberg@comcast.net>

see attached

From: **Paul Dulberg** pdulberg@comcast.net
Subject: Fwd: RE: from tom
Date: October 8, 2018 at 12:51 PM
To: paul_dulberg@comcast.net



----- Forwarded Message -----

Subject: RE: from tom
Date: Wed, 3 Oct 2018 17:54:40 +0000
From: Thomas W. Gooch III <gooch@goochfirm.com>
To: Paul Dulberg <pdulberg@comcast.net>

As you know I have a permanent disability. You may not know I am on medication to control pain and spasms and this medication does not allow me to focus on complex subjects for a prolonged time. Since I do not understand your last email and I don't have much time before appearing in court I need to know where I stand.

You seem to have been very focused when you delivered to me your research notes on the elements of legal malpractice, not that I need the written lecture on what legal malpractice consists of

Are you thinking of not continuing to represent me in this case?

Yes I am considering withdrawing on your behalf. I need no research from you on legal malpractice answering my questions on facts is helpful when I ask. I want no more involvement from your brother, Obviously he can talk to you all you want, I can't prevent that but if I perceive further interference from him then I will have to re-evaluate my continued ability to competently represent you. I will not allow him to be here in my office for any purpose.

Are you going to submit a second amended complaint on October 10 and appear in court?

We may seek an extension, we appear on court dates as a general rule always. You do not and have not had any court dates that require your appearance.

Will I be given enough time to review the complaint before it is submitted?

When I determine the complaint is in my opinion legally sufficient it gets filed, naturally you will get a copy of it for your records.

May I comment on it or request changes to it or ask questions about it?

You, not your brother, can ask all the questions you wish. I generally do not ask a client if a complaint is legally sufficient, nor do I want a client drafting a complaint that I have to sign. Most clients do not know the difference between pleading conclusions of law or fact, pleading evidence or the correct pleading of ultimate material factual allegations. In as

much as you have advised you are on pain medicine unable to “focus on complex subjects I question how much you could help in any event. I can get a lot done when I don’t have to answer emails like this one.

I do not want to offend anyone, so I need to know what I can comment on or ask questions about.

Making demands and lecturing me on the law are great ways to be offensive, likewise demanding to know when you will be called and comments about caring about anyone else we represent or other cases is not conducive to not offending us.

gooch

From: Paul Dulberg <pdulberg@comcast.net>
Sent: Wednesday, October 03, 2018 11:02 AM
To: Thomas W. Gooch III <gooch@goochfirm.com>; Sabina Walczyk <swalczyk@goochfirm.com>; Office Office <office@goochfirm.com>; Nikki <nikki@goochfirm.com>
Subject: Re: from tom

Hello Tom and Sabina,

I didn't understand the last email I received so I need some clarification. I was never rude or not courteous to your staff and your staff was always courteous to me. Yesterday I talked with Nikki briefly just to confirm that the office received the email and find out when I should expect to receive the second amended brief for review. She was friendly and courteous. I said nothing rude or offensive.

I never ordered you or anyone to call me yesterday. I honestly don't know why you believe I did. I was not aware there was anything offensive in the attachment I sent. As I read it again I still can't see anything offensive in it.

As you know I have a permanent disability. You may not know I am on medication to control pain and spasms and this medication does not allow me to focus on complex subjects for a prolonged time. Since I do not understand your last email and I don't have much time before appearing in court I need to know where I stand.

Are you thinking of not continuing to represent me in this case?

Are you going to submit a second amended complaint on October 10 and appear in court?

Will I be given enough time to review the complaint before it is submitted?

May I comment on it or request changes to it or ask questions about it?

I do not want to offend anyone, so I need to know what I can comment on or ask questions about.

I have no memory of any inappropriate behavior when talking to Nikki yesterday. Please let me know how I can communicate with your staff or what I can include in an email in the future so you are not offended again.

Sorry if I did anything wrong.

Sincerely,

Paul Dulberg

On 10/2/2018 1:06 PM, Thomas W. Gooch III wrote:

Mr. Duhlberg;

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Date:Tue, 2 Oct 2018 07:32:00 -0500

From:T Kost <tkost999@gmail.com>

To:me <pdulberg@comcast.net>

see attached



From: Paul Dulberg pdulberg@comcast.net 
Subject: Fwd: Fwd: from tom
Date: October 8, 2018 at 12:55 PM
To: paul_dulberg@comcast.net



----- Forwarded Message -----

Subject: Fwd: from tom

Date: Tue, 2 Oct 2018 09:11:13 -0500

From: Paul Dulberg pdulberg@comcast.net

To: Thomas W. Gooch III gooch@goochfirm.com, Sabina Walczyk swalczyk@goochfirm.com, Office
Office office@goochfirm.com, Nikki nikki@goochfirm.com

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To: me pdulberg@comcast.net

see attached



second_amende
d_complaint.txt

From: PAUL DULBERG paul_dulberg@comcast.net 
Subject: Fwd: Middle of Gooch communications
Date: November 17, 2018 at 12:11 PM
To: juliawilliams@clintonlaw.net
Cc: ed@clintonlaw.net



					
Dulberg v_ Law Offices...al_.eml	Re/ Dulberg v_ Law Of...al_.eml	Re/ Dulberg v_ Law Of...al_.eml	Dulberg v_ Popvich.eml	Dulberg vs_ Law Offices...a_.eml	Re/ Dulberg vs_ Law Of...a_.eml
6 KB	249 bytes	11 KB	11 KB	6 KB	249 bytes

From: Paul Dulberg pdulberg@comcast.net 
Subject: Fwd: Sent emails to Gooch End
Date: November 17, 2018 at 12:23 PM
To: juliawilliams@clintonlaw.net
Cc: ed@clintonlaw.net

