



T Kost <tkost999@gmail.com>

Fw: Basic outline of affidavit

1 message

Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>

Wed, Nov 1, 2023 at 3:51 PM

To: Paul Dulberg <pdulberg@icloud.com>, Paul Dulberg <Paul_Dulberg@comcast.net>, T Kost <tkost999@gmail.com>

From: Saira Pasha <saira@audittrailpro.com>
Sent: Wednesday, November 1, 2023 3:07 PM
To: Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>
Subject: Basic outline of affidavit

Hi,

I'm going to write my affidavit late tonight/early AM and will have it to you by 11 a.m. tomorrow, and earlier if possible.

Below is the very basic outline of how I'm going to organize my affidavit in case you want to edit your motion accordingly.

Thanks,
Saira

BACKGROUND/QUALIFICATIONS

RETAINED BY THE LAW OFFICE OF ALPHONSE TALARICO TO REVIEW

I REVIEWED THE FOLLOWING MATERIALS

BASED ON MY REVIEW, I HAVE CONCLUDED THE FOLLOWING

- There are significant, substantive discrepancies in the file contents (will cite 2 examples very briefly, one being the transcript)
- Audit trails from the relevant filing systems should be generated. The audit trails will provide objective data about actions specific users performed in those systems (view, create, modify, etc.) and when those actions were performed to assist with determining when exactly the discrepancies were created and which person(s) would be knowledgeable about these events.

THIS IS HOW I CAME TO MY CONCLUSIONS

This is where I will insert screen shots of the documents you sent me to illustrate the discrepancies. I will use 3 examples at most and focus on them.

THIS IS WHAT AN AUDIT TRAIL FROM THE COURT SYSTEMS WOULD SHOW

- I will show screen shots of sample court filing system audit trails pulled from the internet as illustrative examples.

THIS IS WHAT I RECOMMEND