

TABLE 1: CHARLIE BROWNING PERMANENTLY DISABLED TARGET IN 12LA178

(Blue region is Popovich-Mast Representation, yellow region is Balke representation and pink region is Baudins representation)

		POPOVICH-MAST	BARCH	ALLSTATE	BALKE	BAUDINS	MEYER
		12LA178 case timeline 12LA178 timeline and BK 14-83578 timeline compared here and here	12LA178 case timeline 12LA178 timeline and BK 14-83578 timeline compared here and here	12LA178 case timeline 12LA178 timeline and BK 14-83578 timeline compared here and here	12LA178 case timeline 12LA178 timeline and BK 14-83578 timeline compared here and here	12LA178 case timeline 12LA178 timeline and BK 14-83578 timeline compared here and here	12LA178 case timeline 12LA178 timeline and BK 14-83578 timeline compared here and here
1	2011-12-06	Redirected medical lien liability from the Defendants to Plaintiff (Exhibit 1 , p5, paragraph 1-34 and p10, paragraph 1-74 and beginning on p55, paragraph 2-1-A1)					
2	2012-11-28	Destroyed key evidence (Exhibit 1 , p13, paragraph 1-95) Key evidence destroyed					
3	2012-11-01	Corrupted the interrogatory and document production process to sabotage client's case and to benefit defendants (in collaboration with opposing attorneys) (Exhibit 1 , p13, paragraph 1-94)	It is not possible that Barch did not know that Gagnon never answered interrogatories issued by Plaintiff Dulberg.	Allstate attorney Accardo never had Gagnon answer the interrogatories that were sent by attorneys Mast and Popovich on October 3, 2012. (Exhibit 1 , p13, paragraph 1-94) It is not possible that Allstate did not know that Gagnon never answered interrogatories issued by Plaintiff Dulberg. Is is also not possible that Allstate was not aware the Baudins could also see that Gagnon never answered Plaintiff's interrogatories.			
4	2013-02-13	Corrupted the deposition process to sabotage client's case and to benefit defendants in collaboration with opposing attorneys (9 out of 10 depositions have no valid certification) (Exhibit 1 , p51, paragraph 1-301) It is not possible to have all 5 depositions of doctors without certification pages without collaboration between opposing counsels. Each attorney must have known the others were engaging in unethical behavior and, according to the "Himmel Rule" has the duty to report what they knew.	All 5 depositions of Doctors in PI case 12LA178 do not have valid certification pages. 4 other depositions have certification pages with signatures that are not valid. Barch must have ordered at least some of the Doctor's depositions (if not all of them). Barch must have known there were no depositions of doctors with valid certification pages. (Exhibit 1 , p51, paragraph 1-301) It is not possible to have all 5 depositions of doctors without certification pages without collaboration between opposing counsels. Each attorney must have known the others were engaging in unethical behavior and, according to the "Himmel Rule" has the duty to report what they knew.	All 5 depositions of Doctors in PI case 12LA178 do not have valid certification pages. 4 other depositions have certification pages with signatures that are not valid. Allstate must have ordered at least some of the Doctor's depositions. Allstate must have known there were no depositions of doctors with valid certification pages. (Exhibit 1 , p51, paragraph 1-301) It is not possible to have all 5 depositions of doctors without certification pages without collaboration between opposing counsels. Each attorney must have known the others were engaging in unethical behavior and, according to the "Himmel Rule" has the duty to report what they knew.			
5	2013-02-13	Forged certification pages for depositions (Exhibit 1 , p16, paragraph 1-114) Document examination agency Omni completed report on 2 court reporter signatures found on 5 depositions in underlying case 12LA178 and found signatures don't match known samples (Omni findings , Erickson report and Orton report)	Knew there were depositions with no valid certification pages (Exhibit 1 , p16, paragraph 1-114) Document examination agency Omni completed report on 2 court reporter signatures found on 5 depositions in underlying case 12LA178 and found signatures don't match known samples (Omni findings , Erickson report and Orton report)	Knew there were depositions with no valid certification pages (Exhibit 1 , p16, paragraph 1-114) Document examination agency Omni completed report on 2 court reporter signatures found on 5 depositions in underlying case 12LA178 and found signatures don't match known samples (Omni findings , Erickson report and Orton report)			
6	2013-02-13	Led the deposition witness Gagnon to commit perjury around the key evidence Popovich and Mast destroyed (Exhibit 1 , p17, paragraph 1-118)					
7	2013-02-13	Knew Defendant Gagnon committed perjury (Exhibit 1 , p17, paragraph 1-118)					
8	2013-03-01	Knew Defendant Gagnon effectively admitted to negligence for Dulberg's injury (Exhibit 1 , p16 paragraph 1-110)		Allstate attorney Accardo never filed an answer to the CROSS-CLAIM accusing Gagnon of negligence in Dulberg's injury. (Exhibit 1 , p16, paragraph 1-110) It is not possible that Allstate did not know Gagnon did not file an answer CROSS-CLAIM FOR CONTRIBUTIONS. It is also not possible that Allstate was unaware that the information was in the 12LA178 common law record.			
9	2013-03-19	Led the deposition witness Carolyn McGuire to commit perjury around the key evidence Popovich and Mast destroyed (Exhibit 1 , p21, paragraph 1-141)					
10	2013-03-19	Knew Defendant Carolyn McGuire committed perjury (Exhibit 1 , p21, paragraph 1-142)					
11	2013-08-05			All 5 depositions of Doctors in PI case 12LA178 do not have valid certification pages. 4 other depositions have certification pages with signatures that are not valid. Allstate must have ordered at least some of the Doctor's depositions (if not all of them). Allstate must have known there were no depositions of doctors with valid certification pages. (Exhibit 1 , p51, paragraph 1-301) It is not possible to have all 5 depositions of doctors without certification pages without collaboration between opposing counsels. Each attorney must have known the others were engaging in unethical behavior and, according to the "Himmel Rule" has the duty to report what they knew.			
12	2013-10-22	Made settlement offer in Dulberg's name without informing Dulberg (Exhibit 1 , p23, paragraph 1-148) Settlement offer	Received \$7,500 settlement offer from Popovich and Mast while knowing the Doctors depositions were not valid (Exhibit 1 , p23, paragraph 1-148) Settlement offer				
		Timeline of events from around 10-22-2013 to around 2-5-2014 in this text file The timeline has been provided to Clinton-Williams and Talarico many times					
13	2014-01-20	Committed settlement fraud "Smoking gun" evidence of intentional tort by Popovich and Mast first discovered on July 8, 2019 and provided to Clinton-Williams and Talarico many times					
14	2014-08-20	Suppressed information on mental health issues related to Dulberg's injury (Exhibit 1 , paragraph ##)					
15	2014-11-26	Dulberg declared bankruptcy.		Dulberg declared bankruptcy. Allstate violated the automatic stay for around 2 years. It is not possible that Allstate did not know that the Baudins (and Popovich and Mast and Balke) did not inform the Court of Dulberg's bankruptcy because Allstate was the attorney of the remaining defendant Gagnon. Allstate must have known that they were acting in violation of federal bankruptcy laws from November, 2014 onward.			
16	2015-02-14	Violated federal bankruptcy laws		Violated federal bankruptcy laws			
	2015-02-14	Popovich and Mast attempted to settle the remainder of the case with Gagnon for \$50,000 maximum. (Exhibit 1 , p37, paragraph 1-216) 12LA178 timeline and BK 14-83578 timeline compared here and here		Allstate attempted to settle the case through Dulberg's attorneys Popovich and Mast in the 22nd Judicial Circuit Court in violation of the automatic stay 12LA178 timeline and BK 14-83578 timeline compared here and here			
17		Forged pre-trial settlement memo (Exhibit 1 , p41, paragraph 1-240)					
18	2015-03-19				Contracted with Dulberg and not with the Bankruptcy Trustee (who had standing as plaintiff) (Exhibit 2 , p1, paragraph 4)		
19	2015-03-30				Had no doctors depositions but did not inform Dulberg		
20	2015-03-30				Had no Gagnon interrogatories but did not inform Dulberg		
21	2015-03-30				Had no valid certification pages on remaining depositions but did not inform Dulberg		
22	2015-06-12				Told Dulberg (about 11 weeks later) he would withdraw counsel if Dulberg does not settle with Allstate for \$50,000 12LA178 timeline and BK 14-83578 timeline compared here and here		
23	2015-06-12			Violated federal bankruptcy laws			
24	2015-06-12			Allstate attempted to settle the case through Dulberg's attorney Balke in the 22nd Judicial Circuit Court in violation of the automatic stay (Exhibit 2 , p8, paragraph 24) 12LA178 timeline and BK 14-83578 timeline compared here and here			
25	2015-06-12			Allstate appeared as opposing counsel to Dulberg when Dulberg had no counsel and when Dulberg was told by the 22nd Judicial Circuit Court Judge Meyer that Dulberg had to file an appearance pro se or face a motion to dismiss in violation of the automatic stay. (Exhibit 2 , paragraph ##)			
26	2015-09-22					The Baudins contracted with Dulberg instead of with the Bankruptcy Trustee (even though they knew Dulberg had no standing as plaintiff). (Exhibit 3 , p3, paragraph 19)	
27	2015-09-22 onward					The Baudins never informed Dulberg that he had no standing as plaintiff.	
28	2015-11-06 onward					Popovich and Mast never demanded that defendant Gagnon answer any interrogatory questions. The Baudins never informed Dulberg that Gagnon did not answer interrogatories. The Baudins never raised the issue with Allstate. There is no evidence the interrogatory questions from Dulberg to Gagnon were ever sent to opposing counsel. (Exhibit 3 , p6, paragraph 24)	
29						None of the 3 different PI Law Firms retained by Dulberg (including the Baudins) informed Dulberg that Defendant Gagnon effectively admitted negligence for Dulberg's injury as of early March, 2013. (Exhibit 3 , p4, paragraph 25)	
30	2015-11-06					The Baudins filed their APPEARANCE as REGULAR COUNSEL in 12LA178 on 11/6/2015 in violation of the automatic stay. (Exhibit 3 , paragraph ##)	
31	2015-11-06 onward					There is no APPEARANCE filed by the Baudin Defendants that is not VOID in case 12LA178. (Re Enyetu)	
32	2016-09-26					The Baudin Defendants' failed to file an APPEARANCE to represent the bankruptcy estate in case 12LA178 after being hired as special counsel by Trustee Olsen. (Exhibit 3 , paragraph ##)	
33	2014-11-28 onward			Allstate violated federal bankruptcy laws		Baudins violated federal bankruptcy laws	
34				Allstate had no valid certification pages on remaining depositions		The Baudins had no valid certification pages on remaining depositions but did not inform Dulberg (Exhibit 3 , paragraph ##)	
35				Gagnon's deposition Exhibit 2 appears to be 2 papers spliced together to look like one paper.		Gagnon's deposition Exhibit 2 appears to be 2 papers spliced together to look like one paper. The Baudins never challenged it or informed Dulberg of it. (Exhibit 3 , paragraph ##)	
36	2014-11-26 to 2016-12-12			The Honorable Judge Thomas M. Lynch in Bankruptcy Petition #: 14-83578 was never informed that the 22nd Judicial Circuit Court continued to have hearings and issue orders on the case for almost 2 years (since November 26, 2014 when Dulberg declared bankruptcy) in violation of the automatic stay.		The Honorable Judge Thomas M. Lynch in Bankruptcy Petition #: 14-83578 was never informed that the 22nd Judicial Circuit Court continued to have hearings and issue orders on the case for almost 2 years (since November 26, 2014 when Dulberg declared bankruptcy) in violation of the automatic stay.	
37	2016-06-13 to 2016-08-10			Allstate attempted to settle the case through the Baudins in the 22nd Judicial Circuit Court. (Exhibit 3 , p5, paragraph 26, p6, paragraph 29, p14, paragraph 87, p21, paragraph 133)		The Baudins moved to cap the value of PI case 12LA178 (with defendants Allstate alone) (Exhibit 3 , paragraph ##)	
38	2016-08-10			The \$300,000 upper limit was placed on the value of the PI case by: Allstate attorney Reddington and the Baudins. (Exhibit 3 , p21, paragraph 133) 12LA178 timeline and BK 14-83578 timeline compared here and here		The Baudins closed the deal with an upper cap of \$300,000 (in violation of the automatic stay) (Exhibit 3 , p21, paragraph 133) 12LA178 timeline and BK 14-83578 timeline compared here and here	
39	2016-08-10 onward					The Baudins forced Dulberg into binding mediation and misinformed him of where the 'upper cap' came from (Exhibit 3 , p25, paragraph 153)	
40	2016-10-03			Independent Medical Examiners Craig Phillips and Rishi Garb (working with Allstate) claimed to have based their opinions on reading the depositions of Doctors. Allstate must have known that their IME reports were based on depositions of Doctors that did not have valid certification pages. (Exhibit 3 , p24, paragraph 151)			
	2016-12-08						
	2016-12-12						
41	2019-05-30	Committed fraud on the court in 17LA377					