

TABLE 3: CHARLIE BROWNING PERMANENTLY DISABLED TARGET IN 17LA377

(Blue region is Gooch-Walczyk Representation, yellow region is Clinton-Williams representation and pink region is Talarico representation)

		GOOCH	CLINTON-WILLIAMS	TALARICO	FLYNN	MEYER	BERG
1		Gooch locked-in Dulberg's claims according to a hidden strategy described in this table					
2	2016-12-16	Gooch told Dulberg and his brother, Thomas Kost, that the 2 year statute of limitations begins to run immediately as of Dulberg's first meeting with Gooch. (Exhibit 4, Paragraph 17)					
3	2016-12-16	Gooch wrote to Popovich in a letter, "I intend to file suit against you in the next 7 days" (29) (35) On November 26, 2017 Thomas Gooch filed Dulberg's COMPLAINT AT LAW on November 26, 2017 (which was about 330 days after the time Gooch claimed he would do it. (Exhibit 4, Paragraph 37) Documents from first meeting with Gooch					
4	2017-06-26	The best of 12LA178 paper-case files Dulberg left with Gooch just after their first meeting on December 16, 2016 were not scanned into digital files the until June 26, 2017 to June 28, 2017. When Gooch scanned in files					
5	2017-11-28	COMPLAINT AT LAW was filed which consists of 22 paragraphs. There is not a single point in any paragraph related to the duty of care the McGuires owed to Dulberg or any breach of that care (which is considered the "underlying case" or "case within a case" as all legal malpractice attorneys are undoubtedly aware). Trial Handbook for Illinois Lawyers - Legal Malpractice					
6	2017-11-28	Thomas Gooch did not refer at all to the legal theory (Tiltschner v Spangler and the Restatement of Torts 318) which Mast gave to Dulberg to explain why Mast believed the McGuires were not liable for Dulberg's injury in the COMPLAINT AT LAW					
7		Gooch did not include any information about Brad J. Balke, W. Randall Baudin, Kelly Baudin, the Baudin Law Group, Baudin & Baudin or Trustee Olsen or name any of them as defendants. None of their names appeared in the complaint at all. Thomas Gooch did not mention anything about Dulberg's bankruptcy in the complaint or about any attorney violating any automatic stay. (Exhibit 4, Paragraph 43) 12LA178 timeline and BK 14-83578 timeline compared here and here This pattern fits the hidden strategy described in this table					
8		Thomas Gooch did not include the fact that Dulberg never agreed to enter into binding mediation and never signed any agreement in the complaint. In fact, in the complaint Gooch wrote that a "high-low agreement" had been "executed by Dulberg" in paragraph 16 (Exhibit 4, Paragraph 45) Total court statements on source of 'upper cap' on value of 12LA178					
9		Gooch knew or should have known that the CROSS-CLAIM filed on February 1, 2013 by the McGuires against Gagnon was never answered by Gagnon since early March, 2013. (Exhibit 4, Paragraph 47)					
10		Gooch knew or should have known that Popovich and Mast, and Balke, and the Bandins also knew or should have known the CROSS-CLAIM filed by the McGuires against Gagnon was never answered. (Exhibit 4, Paragraph 48)					
11	2018-06-07	FIRST AMENDED COMPLAINT AT LAW1 was filed with the Court. The FIRST AMENDED COMPLAINT AT LAW consists of 32 paragraphs. The first 13 paragraphs are identical to the original complaint. There were (once again) no paragraphs related to the duty of care the McGuires owed to Dulberg or a breach of that care in the FIRST AMENDED COMPLAINT. (Exhibit 4, Paragraph 64) Trial Handbook for Illinois Lawyers - Legal Malpractice					
12		There is no mention of any automatic stay. Thomas Popovich individually is not named as a defendant. Rather than simply listing the ways in which McGuires were liable for Dulberg's injury (as required by Illinois law), Gooch attempted to argue that such a simple list is not necessary. (The same "trap door" was written into the AMENDED COMPLAINT. (Exhibit 4, Paragraph 68)					
13	2018-08-07	The information in the attached file was never included in any of the pleadings or the Gooch case file turned over after Gooch was fired by Dulberg suggesting that Gooch intentionally ignored the contents of this email. (Exhibit 4, Paragraph 77)					
14	2018-08-17	Gooch produced "Argument (under 2-615)?"2 titled "Dulberg sufficiently states a cause of action for legal malpractice against the Defendants" in which in paragraph 1 (line 1) Gooch states: "In his First Amended Complaint, DULBERG sufficiently set forth the necessary elements of legal malpractice" (Exhibit 4, Paragraph 74) Trial Handbook for Illinois Lawyers - Legal Malpractice					
15	2018-09-10	On September 10, 2018 Dulberg delivered copies of chain-of-custody manuals to the office of Gooch. They were scanned and named: Dulberg Manual Received on 9.10.18 fr. Client- 3.pdf Dulberg Manual Received on 9.10.18 fr. Client- 2.pdf The files were placed in the Gooch digital case file in this folder: Gooch_Thumbdrive/ UNTRYING CASE DOCS Gooch, Popovich, Mast, Clinton and Williams all mocked to their permanently disabled client, Dulberg as 'Dulb-iberg' many times					
16	2018-09-12	The hearing on the Motion to Dismiss took place. Neither Gooch nor Sabina appeared in court. They did not announce they wouldn't attend beforehand. They simply didn't show up. Dulberg was alone in court.					
17	2018-10-02	Thomas Gooch replied to Dulberg by email stating: > > Mr. Dulberg: > > I have your attachment and am deeply offended by it. (Exhibit 4, Paragraph 93) Gooch, Popovich, Mast, Clinton and Williams all mocked to their permanently disabled client, Dulberg as 'Dulb-iberg' many times					
18	2018-10-03	Gooch stated: "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."					
19		Dulberg gave Gooch an Advance payment retainer of \$10,000.00 plus an additional advance of \$5000.00 for costs. \$480.00 went to copy costs and filing fees. The remaining \$4520.00 was for hiring an expert witness. Gooch never hired the expert witness and never returned the advance. Gooch profited \$14,520.00 from Dulberg. \$4,520.00 of which should have been returned to Dulberg upon Gooch's withdrawal but never was. (Exhibit 4, Paragraph 103)					
20		Total court statements on BK 14-83578 during Gooch representation: 0 This fits the pattern of the hidden strategy described in this table					
21		The Gooch case file was received by the Clinton Law firm on or about November 21, 2018. Thumbdrive with the Gooch case file contains switched file names for Saul Ferris letter and Kupets and DeCaro letter. There are no "Tiltschner v Spangler" references anywhere on the Thumbdrive.					
22	2018-10-10		Clinton-Williams knew or should have known defendant Gagnon effectively admitted negligence for Dulberg's injury (Exhibit 5, Chapter 2, Section 2C)				
23	from 2018-12-06		Clinton-Williams locked in Dulberg's claims very similar to how Gooch locked in Dulberg's claims according to a hidden strategy described in this table				
24	2018-12-06		Suppression of Bankruptcy (Exhibit 5, Chapter 2, Section 2A) Total court statements on BK 14-83578 during Gooch, Clinton and Williams representation. 1				
25	2019-05-29 and 2020-07-09		Suppression of documents (Exhibit 5, Chapter 1) Systematic document and information suppression here , here and here and in this video and this video				
26	2019-05-29 and 2020-07-09		Email suppression here and here and here and in this video				
27	2019-05-29		Suppression of Balke documents (Exhibit 5, Chapter 2, Section 2D)				
28	2019-05-29 onward		Suppressing key evidence Tiltschner v Spangler (Exhibit 5, Chapter 2, Section 2C) Suppressing key evidence here and here and here and described in this video and this video				
29	2019-07-08		Was informed the client found "overwhelming" and "smoking gun" evidence of intentional tort Suppressing evidence of intentional tort				
30	2019-05-29		Collaboration on Saul Ferris (Exhibit 5, Chapter 2, Section 2B)				
31	2019-09-05		Total court statements on source of 'upper cap' on value of 12LA178 12LA178 timeline and BK 14-83578 timeline compared here and here				
32	2019-12-06		Collaboration on suppressing Baudin information (Exhibit 5, Chapter 2, Section 2F)				
33	2020-02-19		Suppression of Barch documents (Exhibit 5, Chapter 2, Section 2H)				
34	2020-01-29		Collaboration to weaken certification pages of document production (Exhibit 5, Chapter 2, Section 2)				
35	2020-02-19		Effort to place 'upper cap value' on value of 17LA377 (Exhibit 5, Chapter 2, Section 2)				
36	2020-06-25		Collaboration during deposition of Mast and after (Exhibit 5, Chapter 2, Section 2K)				
37	2020-07-02		Collaboration on supplemental production (Exhibit 5, Chapter 2, Section 2E)				
38	2020-10-20			Dulberg retained Talarico. Dulberg told Talarico he wanted to raise issue of "overwhelming evidence", of intentional tort first discovered around July 8, 2019 in a 3rd amended complaint. Talarico never filed a 3rd amended complaint from 10-20-2020 to abruptly resigning on 01-14-2024.			
39	2022-02-17			Talarico first discovered that presiding Judge Meyer is personal friends with Popovich yet never raised the issue in court (email)			
40	2022-02-20			First discovery of fraud on the court by Talarico in 17LA377 and 12LA178 (Timeline of discoveries and overview of timeline)			
41	2022-05-24			Document examination agency Omsi completed report on 2 court reporter signatures found on 5 depositions in underlying case 12LA178 and found signatures don't match known samples (Omsi findings, Erickson report and Orton report)			
42	2022-06-06			Talarico attempted to get Dulberg to file 3rd Amended Complaint which does not mention forged signatures and other important evidence. Dulberg refused. (email). This is the only time Talarico attempted to file a 3rd Amended Complaint.			
43	2022-07-11			FI discovery was closed on the court by Talarico in 17LA377 and Talarico did not mention the forged signatures or the presiding Judge friendship with defendant Popovich during the hearing			
44	2022-07-12			Talarico never filed 3rd Amended Complaint that Dulberg wanted to file			
45	2022-11-09			Talarico was provided evidence of sophisticated system of document and information suppression used by Clinton-Williams and collaboration with opposing counsel Flynn in 17LA377 but never raised the issue with presiding Judge. (email, timeline of raising issue to Talarico and overview of timeline)			
46	2023-02-01			Popovich and Mast were summarily dismissed from 17LA377 based on 2 year statute of limitations			
47	2023-03-03			Talarico filed notice of appeal in a way that classified Dulberg as a Pro-se litigant (SRL) Appeal Notification sabotage			
48	2023-05-22			Talarico was provided evidence that the ROP and CLR prepared by the 22nd Judicial Circuit Court clerk had hyperlinks that did not work, were missing 2 ROPs and had metadata creation dates that were inconsistent with the timeline of events (email, evidence here and here)			
49	2023-05-25			Talarico filed a motion for extension of time without mentioning the technical problems with the CLR and ROP			
50	2023-07-25			Talarico filed a second motion for extension of time without mentioning the technical problems with the CLR and ROP			
51	2023-10-03			Talarico filed a third motion for extension of time without mentioning the technical problems with the CLR and ROP			
52	2023-11-20			Talarico filed an Emergency Motion for a third extension of time			
53	2023-12-04			Appeal was dismissed for "failure to file a brief"			
54	2024-01-04			Talarico intentionally misrepresented Supreme Court Petition template to clients Supreme Court Petition sabotage			
55	2024-01-06			Talarico told clients to place a "Preamble" at the beginning of the Supreme Court Petition (email)			
56	2024-01-06			Talarico wrote the first paragraph in the "preamble" (email)			
57	2024-01-08			Told clients the Supreme Court clerk told him by phone that hyperlinks are allowed in the Supreme Court Petition			
58	2024-01-08			Talarico told client Talarico does not know how to format an Appendix for Supreme Court Petition because he has never did one before			
59	2024-01-14			Abruptly resigned as counsel (email)			
60	2024-03-10			Refused to give clients any case files for any of the at least 6 cases for which Talarico was retained			
61	2024-03-29			Talarico reply letter to ARDC accused Dulberg and Kost of many things which contradict evidence			