intentional collaboration with opposing attorneys (9 out of 10 <u>tort</u> depositions have no valid certification pages) Knew Defendant Gagnon effectively admitted to <u>Bury</u> negligence for Dulberg's injury Tilschner v Knew Defendant Gagnon committed perjury Spangler Knew Defendant Carolyn McGuire committed Hide fact perjury that 9 Committed settlement fraud out of 10 Violated federal bankruptcy laws depositions in underlying case have no valid certification pages Hide court reporter forgeries on certification pages Hide

FRAUD CHART BY ATTORNEY

5 to 12

12LA178 timeline and

Defendants to Plaintiff

related to Dulberg's injury

least 15 examples)

attorneys)

'choke client' and methods of 'choking client'

BK 14-83578 timeline compared here and here

As demonstrated in **Exhibit 1**, Popovich and Mast:

Forged documents and destroyed evidence (at

production process to sabotage client's case and to

benefit defendants (in collaboration with opposing

Suppressed information on mental health issues

Corrupted the deposition process to sabotage

client's case and to benefit defendants in

Redirected medical lien liability from the

Corrupted the interrogatory and document

13

STORY:

'run for cover stories'

Dulberg had weak case against McGuires

It was Dulberg's word against Gagnon's word

(a) "Dulberg had separate legal counsel who

represented him after we withdrew".

then Dulberg had counsel who could

have advised him of his rights, with the

(b) "If there had been legal malpractice,

applicable statue of limitations".

ACTUAL POPOVICH-MAST COVER

2023-11-28 Popovich Reply ARDC.pdf

T

2

M

'bury key

evidence'

Hide Wal-

greens RX

timestamps

Hide Gagnon's

admission of

negligence

Hide Gag-

non and

McGuire

perjury

during

deposi-

<u>Suppress</u>

evidence of

violations of bankruptcy laws like automatic stay and standing as plaintiff in pending cases

Misrepresent Dulberg's standing as plaintiff

case have no valid certification pages

Evidence of Gooch and Clinton concealment and cover of previous fraud as described in Exhibit 4 and Exhibit 5

v Spangler

Hide Gagnon's

admission of

Meyer recusal

negligence

Ignore

records

Heeg

Bankruptcy

Ignore bank-

ruptcy trustee

Misrepresent Dulberg's

standing as

Hide source of

prime movers

behind 'bind-

ing mediation'

Hide Judge

Meyer recusal

based on per-

sonal friend-

ship with Popovich

Evidence of Gooch and Clinton concealment and cover of previous fraud as described in Exhibit 4 and Exhibit 5

Hide Gagnon's

admission of

Hide Tilschner

negligence

v Spangler

<u>Suppress</u>

evidence of

<u>intentional</u>

Ignore Bank-

ruptcy records

Misrepresent Dulberg's

standing as

Ignore bank-

ruptcy trustee

Hide source of 'upper cap'

prime movers

behind 'bind-

ing mediation'

Meyer recusal

based on personal friend-

ship with

Popovich

Hide applicable Illinois

urban Real

Estate and

Hide fact that 9 out of 10 depositions in underlying case have no valid certification pages

Evidence of Gooch and Clinton concealment and cover of previous fraud as described in Exhibit 4 and Exhibit 5

Clinton-Williams sophisticated system of document and information suppression and collaboration with opposing counsel as described in Exhibit 5

Clinton-

Williams

system of

sophisticated

document and

information

suppression

collaboration

with opposing

counsel as

Exhibit 5

Evidence

of Gooch

and Clinton

concealment

and cover of

previous fraud as described in

Exhibit 4 and Exhibit 5.

Hide Judge Meyer recusal

based on personal friend-

ship with

Popovich

Hide fact

out of 10 deposi-

tions in

no valid

certifica-

tion pages

Misrepresent

Dulberg's

plaintiff

<u>Suppress</u>

<u>tort</u>

evidence of intentional

1 Table 6 on page 69 of Evidence of Fraud on the Court in 17LA377 During Gooch-Walczyk Representation

standing as

Hide forgeries

underlying case have

that 9

described in

and

Talarico

Bury all

"Charlie

Bury all

"Charlie

<u>4</u>

information

in this table::

Brown" Table

Avoid then

information

in this table:

Brown" Table

distort all

"Charlie

information

in this table:

Brown" Table

Bankruptcy

application

Multiple issues

listed in the appeal

Helped set

(Statute of

Limitations)

as shown in

Visual Aid

described in

<u>24</u> and as

Exhibit 6

Helped set

up Barton

Doctrine

defense for

defendants

<u>template</u>

was shaved.

are filtered

Judge

or deny an order

Pathway sabotage mappings

Higher court sabotage mappings

Supreme Court Petition sabotage

Appeal notification sabotage

up 2 year SoL

related cases)

case law (Sub-

Hide Judge

plaintiff

Heeg

Hide the

<u>tort</u>

Gooch and

concealment

information

in this table:

Brown" Table

and cover

Bury all

"Charlie

Bury all

<u>2</u>

Bury all

"Charlie

information

in this table:

Brown" Table

information

in this table: <u>"Charlie</u>

Brown" Table

Clinton

Clinton-

Williams

'upper cap'

Hide the

plaintiff

Gooch-Walczyk Hide Tilschner | Bury all

information

in this table:

Brown" Table

"Charlie

Bury all

information

in this table:

Brown" Table

"Charlie

Bury all

"Charlie

information

in this table:

Brown" Table

Meyer recusal

Multiple issues

Hide Gagnon's

Hide applicable

Illinois case law

(Suburban Real

Hide fact that

9 out of 10

depositions

case have

certification

Multiple issues

application

listed in the appeal

no valid

pages

in underlying

Estate and related

admission of

negligence

cases)

listed in the appeal

Bankruptcy

application

Helped set

(Statute of

'escape

Limitations)

hatches' for all

listed above as

PI attorneys

described in

Exhibit 4

Helped set

(Statute of

Limitations)

hatches' for all

listed above as

<u>video</u>

Proceedings)

Balke

to Dulberg

certified slip ruling)

PI attorneys

described in

Exhibit 5

'escape

up 2 year SoL

up 2 year SoL

tions

Popovich-

Mast

E

н о

'bury fraud'

Bury all

"Charlie

Bury all

"Charlie

information

in this table:

Brown" Table

information

in this table:

Brown" Table

D

3

issues'

S

'bury troublesome

U S

E D

'set up escape

opposing side

hatch' for

\$5,000

settlement

Attempts to

place 'upper

cap' on value

of case

	Ignore bank- ruptcy trustee Heeg's role as plaintiff Dulberg's role as Residual Beneficiary of bankruptcy trust Hide Judge Meyer recusal based on per- sonal friend- ship with Popovich					
Balke	Hide Gagnon's admission of negligence Misrepresent Dulberg's standing as plaintiff Ignore Bankruptcy trustee's standing as plaintiff Dulberg's role as Residual Beneficiary of bankruptcy trust Hide violations of bankruptcy laws like automatic stay and standing as plaintiff in	Bury all information in this table: "Charlie Brown" Table 1 Bury all information in this table: "Charlie Brown" Table 2	Hide fact that 9 out of 10 depositions have no valid certification pages	Attempt to place 'upper cap' on value of case	12LA178 timeline and BK 14-83578 timeline compared here and here As described in Exhibit 2, Balke: • Contracted with Dulberg (who Balke knew had no standing as plaintiff) and not with the Bankruptcy Trustee (who had standing as plaintiff) • Told Dulberg (about 11 weeks later) he would withdraw counsel if Dulberg does not settle with Allstate for \$50,000 • Violated federal bankruptcy laws	Summary of accusations against Dulberg in Exhibit 4 (p 69) Table 6, Column 1¹ (a) "Dulberg had separate legal counsel who represented him after we withdrew". (b) "If there had been legal malpractice, then Dulberg had counsel who could have advised him of his rights, with the applicable statue of limitations". ACTUAL BALKE COVER STORY: 2024-03-25_Balke response to ARDC complaint.pdf
Baudins	Hide Gagnon's admission of negligence Misrepresent Dulberg's standing as plaintiff Ignore Bankruptcy trustee's standing as plaintiff Ignore bankruptcy trustee Heeg Dulberg's role as Residual Beneficiary of bankruptcy trust 3 different attempts to place 'upper cap' on value of case Hide violations of bankruptcy laws like automatic stay and standing as plaintiff in pending cases Hide source of 'upper cap' Hide the prime movers behind 'binding mediation' Hide fact that 9 out of 10 depositions in underlying	Bury all information in this table: "Charlie Brown" Table 1 Bury all information in this table: "Charlie Brown" Table 2	Hide applicable Illinois case law (Suburban Real Estate and related cases)	Helped set up 2 year SoL (Statute of Limitations) defense for Popovich, Mast, and Balke Forced binding mediation agreement with defendant Allstate alone by 2016-08-10 in violation of automatic stay Placed 'upper cap' on value of case with defandant Allstate alone in violation of automatic stay	12LA178 timeline and BK 14-83578 timeline compared here and here As demonstrated in Exhibit 3, the Baudins: Contracted with Dulberg (who Baudins knew had no standing as plaintiff) instead of with the Bankruptcy Trustee (who had standing as plaintiff) Knew or should have known Defendant Gagnon effectively admitted to negligence for Dulberg's injury as early as March, 2013 Moved to cap the value of PI case 12LA178 (with defendants Allstate alone) Closed the deal with an upper cap of \$300,000 (in violation of the automatic stay) Coerced Dulberg to agree and misinformed him of where the 'upper cap' came from Moved to contract with Bankruptcy Trustee only after capping value of 12LA178 Misled Bankruptcy Judge that Dulberg wanted Binding Mediation (about 11 weeks after the deal was closed)	ANTICIPATED: (a) "Dulberg had separate legal counsel who represented him after we withdrew". (b) "If there had been legal malpractice, then Dulberg had counsel who could have advised him of his rights, with the applicable statue of limitations". Barton Doctrine Dulberg has no possession of claim ACTUAL BAUDINS COVER STORY: Baudins intentionally misrepresented at least 7 features of BK-83578 to Illinois Supreme Court (through ARDC). Detailed description in this video and this video

Locked-in hidden strategy of 17LA377

<u>Trial Handbook for Illinois Lawyers -</u>

Detailed description of Gooch-Walczyk point of issuance

Total court statements on tolling statute of limitations_

Total court statements on source of 'upper cap' on value of

As demonstrated in Exhibit 4, Gooch-Walczyk and

Conceal key evidence in collaboration with each

other (Tilschner v Spangler certified slip ruling)

Conceal admission of negligence of Defendant

Gagnon for Dulberg's injury in underlying case

Conceal Bankruptcy and Violations of Federal

to pursue claim, capping value of assets in BK

12LA178 timeline and BK 14-83578 timeline

estate, etc) in collaboration with each other

Bankruptcy Laws (automatic stay, loss of standing

Conceal true sources of \$300,000 upper cap on the

value of the PI claim in collaboration with each

Locked-in hidden strategy of 17LA377

described in this video and this video

Suppressing evidence of intentional tort

Total court statements on BK 14-83578: 1

Suppress emails from Saul Ferris

Conceal Dulberg's bankruptcy (from the

Suppressing key evidence here and here and here and

Systematic document and information suppression here

and here and here and in this video and this video

Email suppression <u>here</u> and <u>here</u> and <u>here</u> and in <u>this</u>

As demonstrated in Exhibit 5, Clinton-Williams worked

17LA377 Common Law Record and Reports of

Suppress key evidence (Tilschner v Spangler

Suppress large numbers of emails from Brad

Collaborate with opposing attorney to flood

Suppress evidence that Defendant Gagnon

injury as early as March, 2013.

effectively admitted negligence for Dulberg's

Collaborate with opposing counsel to suppress

Barch documents before Dulberg's deposition

Collaborate with opposing counsel to weaken verification pages of discovery production

Collaborate with opposing counsel during the

evidence of fraud on the court in 12LA178 and

order to make an accurate decision)

Locked-in hidden strategy of 17LA377

Complaint shaved and inserted into frivolous lawsuit

Shaved portions of the 12-8-2022 filed complaint omitted

same 7 features that Baudins intentionally misrepresented

to Illinois Supreme Court (through ARDC) on 6-7-2024.

How claims over actions in PI and BK underlying cases

Talarico higher court sabotages are described in detail in this video and this v

As described in detail in **Exhibit 6**, Talarico:

Did not introduce evidence of fraud on the court

in 12LA178 and 17LA377 or of Clinton-Williams

sophisticated system of document and information suppression or of Clinton-Williams collaboration with

opposing counsel to any presiding Judge (even though it is

critical to know in order to make an accurate decision)

Allowed defendants to be dismissed on 2 year statute of limitations grounds while never raising evidence of

Clinton-Williams sophisticated system of document

collaboration with opposong counsel to any presiding

Played 'hoaxes' on Dulberg and planted 'time-bombs' in Dulberg's efforts to appeal in the 2nd Appellate Court:

Dulberg lost the right to know if Judges or the clerk grant

Dulberg lost the right to know which Judges are involved

in granting or denying an order (if any) so Dulberg lost

Dulberg lost the right to supplement the record with

Dulberg lost the right to supplement the record with

Dulberg lost the right to appeal multiple issues listed in

the right to ask for recusal of any Judge

Dulberg lost the right to file an appeal

Meyer recusal information

bankruptcy information

the appeal application

and information suppression or Clinton-Williams

This mapping and this video show how body of complaint

deposition of Hans Mast and after Cannot introduce

17LA377 to Judge (even though it is critical to know in

Dulberg with over 6,000 documents just before

Clinton-Williams withdrew as Dulberg's counsel

Suppress all information on what the Baudins did

12LA178 in collaboration with each other

sabotage (twice) of Dulberg's claims in this video

Total court statements on BK 14-83578: 0

Clinton-Williams 'teamed-up' to:

Legal Malpractice

here and here

12LA178

compared

other

Dulberg had weak case against Popovich and

Dulberg claimed he "first knew" of his

which turned out to be incorrect.

"injury" at his first meeting with Gooch,

(a) "Dulberg had separate legal counsel who

represented him after we withdrew".

then Dulberg had counsel who could

have advised him of his rights, with the

(a) "Dulberg had separate legal counsel who

represented him after we withdrew".

then Dulberg had counsel who could

ACTUAL CLINTON-WILLIAMS COVER

2023-11-01 R in ltr c r jt response -

Withdrew as counsel under strange

in Exhibit 6

complaint.pdf

circumstances 6 days after Dulberg's

Supreme Court Petition was due as described

ACTUAL TALARICO COVER STORY:

2024-04-30 Talarico response to ARDC

have advised him of his rights, with the

(b) "If there had been legal malpractice,

applicable statue of limitations".

STORY:

Clinton et al .PDF

(b) "If there had been legal malpractice,

applicable statue of limitations".

Mast