

From: Paul Dulberg pauldulberg@gmail.com
Subject: Re: Distribution of balance of retainer Popovich Case
Date: March 7, 2025 at 3:59 PM
To: Alan Kravets alan@kravets.net
Cc: Tom Kost tkost999@gmail.com
Bcc: Paul Dulberg pauldulberg@gmail.com

PD

Mr Kravets,

Thank you for clarifying these things.

You stated in the email, "I was engaged as an Expert Witness to provide an independent opinion in these two cases."

To whom did you send the report with your 'independent opinion' and may I get a copy of it?

In 17LA377 I have never received an 'independent opinion' in the form of a written report. May I please obtain a copy?

You also wrote, "As you have seen in the invoices and time provided to you, I earned and was paid \$4650 for my services leaving a balance of \$2550 in the retainer - to be promptly returned to the proper party in the Popovich case."

In the "Informed Consent Document" dated February 21, 2022, the first point listed is: "I have engaged Alan Kravets as my expert witness", meaning Paul Dulberg engaged you, Alan Kravets, as Dulberg's expert witness. Did Paul Dulberg also engage you as his expert witness in 22L010905, or did Alphonse Talarico engage you for something else? If by Talarico, why were you engaged differently in 22L010905 than you were in 17LA377?

Concerning the Baudin case, are you saying after 9 months you do not have even 15 minutes of billable hours in case 22L010905?

Paul Dulberg
(847) 497-4250
4606 Hayden Ct.
McHenry, IL. 60051

On Mar 7, 2025, at 2:46 PM, Alan Kravets <alan@kravets.net> wrote:

Mr Dulberg ;

A---To help you understand and explain / answer your question-

- 1-Your previous attorney ,Mr Talarico , engaged me as an Expert Witness in the Baudin case.
- 2-I then sent him an invoice dated April 12, 2023 for \$5400 which was the amount I requested for a retainer. He paid me directly - see a copy of his check following -
- 3- .I wrote " paid 4-14-2023 " on the invoice , because I received his check in full payment .
- 4- I was terminated by Mr Talarico, in the Baudin case , before I preformed any work .
- 5- I then promptly returned the entire amount to Mr Talarico-since he was the person who paid me--- See the copy of my check for \$5400 payable to him.
- 6- I never performed ANY billable services as an expert witness in that Baudin case- confirmed by the fact I returned all of the retainer to him- because he was the one who paid me.

B---The Baudin case was Totally different from the Popovich Case in at least two ways;

- 1- I performed no services in Baudin after I received the initial retainer ..I performed services in the Popovich case as previously described in invoices .
 - 2- I promptly returned the money to the person who paid me - Mr Talarico in the Baudin case when I was terminated.
- I have been waiting to hear from you since February 6, 2024 - for information from you and Richard Kost , to promptly return the unused portion of the retainer I received from Richard Kost in the Popovich Case to the proper party. During that time , unfortunately, Richard Kost passed away..
- As you have seen in the invoices and time provided to you, I earned and was paid \$4650 for my services leaving a balance of \$2550 in the retainer - to be promptly returned to the proper party in the Popovich case.

I hope that explains your misunderstanding of the work you think I performed or work you think I did not perform.

So I still do not know why you think I should not be paid for the services as an Expert witness that I performed in the Popovich case .

Please note and I hope you understand the role of an expert witness . I was engaged as an Expert Witness to provide an independent opinion in these two cases.

I was not- and never have been , your lawyer - and do not now nor ever have represented you .

Alan Kravets ,Esq
1340 N. Astor St.
Unit 2803
Chicago , IL 60610
312-320-3264
Alan@kravets.net

scan.pdf

2.1 MB



~~FAX COVER~~

Fax #:

Date:

2-1-2024

TO:

ALPHONSE TALARICO

From:

Alan R. Kravets, Esq.
1340 N. Astor Street
Suite 2803

Chicago, IL 60654

Phone: 312-320-3264

Fax: 312-291-9132

E-mail: Alan@Kravets.net

DWLBERRIS
DAUDIN

2422 L 010905

Total Pages:

NOTES:

1. ON JAN 31 BY EMAIL YOU HAVE TERMINATED OUR AGREEMENT FOR ME TO GIVE EXPERT TESTIMONY.
2. ENCLOSED IS CHECK 103 RETURNING THE ENTIRE RETAINER YOU (\$5400) SENT ME PER MY BILL DATED 4-12-2022
3. NO BILLABLE WORK HAS BEEN PERFORMED SINCE RECEIPT OF THE RETAINER

PLEASE
CONFIRM

YOUR RECEIPT

Alan Kravets

①②③

Date
5/9/2023

Type
Bill

Reference
Initial Retainer

Original Amt.
5,400.00

Balance Due
5,400.00

5/9/2023
Discount
Check Amount

Payment
5,400.00
5,400.00



Alphonse A. Talarico
707 Skokie Blvd., Suite 600
Northbrook, IL 60062
Cook 53293 / DuPage 16385
(312) 808-1410

07/02

CASH ONLY IF ALL CheckLock™ SECURITY FEATURES LISTED ON BACK INDICATE NO TAMPERING OR COPYING

Citibank, N.A.
1825 Lake Cook Road
Northbrook, IL 60062
2-7080/2710

Alan Kravets, Esq.

PAY TO THE
ORDER OF

Five Thousand Four Hundred and 00/100*****

5/9/2023

\$ **5,400.00

12 PROTECTED AGAINST FRAUD

DOLLARS

Alan R. Kravets
1340 N. Astor Street
Suite 2803
Chicago, IL 60610

MEMO

Dulberg V. Baudin et al 2022L010905

Alphonse A. Talarico

ALAN R. KRAVETS, Attorney
1340 N. ASTOR ST. UNIT 2803
CHICAGO, IL 606108437

2-1/710

DATE 2-3-2024

PAY TO THE
ORDER OF

ALPHONSE TALARICO, ATTORNEY \$5,400.00
Five Thousand Four Hundred

CHASE

JPMorgan Chase Bank, N.A.
www.Chase.com

RETURN OF BAUDIN
RETAINER

Alan Kravets

2

Alan R. Kravets, Esq.
Attorney at Law
1340 N. Astor Street, Suite 2803
Chicago IL 60610
(312) 320-3264

April 12, 2023

Alphonse Talarico, Esq.
707 Skokie Boulevard #600
Northbrook IL 60062

Re: Paul Dulberg v. Baudin
Case No. 2002 L 010905
Cook County, Illinois

FOR PROFESSIONAL SERVICES RENDERED FROM FEBRUARY 1, 2022

DATE	DESCRIPTION	HOURS. MINUTES	AMOUNT
4/12/23	Initial Retainer	N/A	\$5,400.00

SUMMARY:

Retainer Billed

\$5,400.00

All work performed by Alan Kravets, Attorney at Law.

Please make payable and remit to:

Alan Kravets, Esq.
1340 N. Astor St., Suite 2803
Chicago IL 60610

Paid 4-14-2023

*Returned
2-1-2024
by check*

(3)