



T Kost <tkost999@gmail.com>

Final draft of Surreply to Baudins Reply to Dulberg's Response to Baudin Motion to Dismiss

3 messages

Paul Dulberg <Paul_Dulberg@comcast.net>

Tue, Jul 25, 2023 at 4:35 AM

To: Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>

Cc: Tom Kost <tkost999@gmail.com>

Dear Mr Talarico,


Attached is my final draft of a surreply to Baudins reply to Dulberg response to Baudins Motion to Dismiss with the exhibits in a separate zip file.

On page 11 ¶25 and page 13 ¶26 are two quoted excerpts from the case of Bloom (on pages 11-12). These 2 excerpts are actually quoted in bloom from previous cases and I am not sure how to cite them properly. I highlighted the text of the citations in red.

The only thing that I can think to possibly add further is the diagnosis from psychologist Dr McMasters about recurring major depression for the disability issue.

The ARDC Complaint against Clinton-Williams is exhibit 4 in the surreply and should probably be sent to the ARDC before or on the same day we submit the surreply.

Thank you,
Paul

2 attachments **Exhibits.zip**
7206K **2023-07-23_Final draft of _Dulberg surreply.pdf**
291K

Paul Dulberg <Paul_Dulberg@comcast.net>


Mon, Aug 14, 2023 at 8:38 AM

To: Tom Kost <tkost999@gmail.com>

Begin forwarded message:

[Quoted text hidden]

3 attachments

 **Exhibits.zip**
7206K

 **2023-07-23_Final draft of _Dulberg surreply.pdf**
291K

 **2023-07-23_Final draft of _Dulberg surreply.indd**
1804K

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

Mon, Aug 14, 2023 at 8:41 AM

[Quoted text hidden]

 **Allstate MTD response.indd**
5172K