

**Date : 9/18/2023 3:10:06 PM**

**From : "Alphonse Talarico"**

**To : "Paul Dulberg" , "Paul Dulberg" , "T Kost"**

**Cc : "Alphonse Talarico"**

**Subject : Re: MOTION TO RECONSIDER ORDER ENTERED ON AUGUST 29 2023.pdf**

**Attachment : Motion To Reconsider Explained Illinois Law HICLE Online.pdf;**

Gentlemen,

i have attached the Illinois Institute of Continuing Education section regarding Motions To Reconsider in light of the fact that Judge Otto can and will make the August 29, 2023 final and appealable if Allstate's motion for summary judgment is granted.

I have repeatedly told you we should concentrate on the following issues:

Overview Appellant's Brief due in the 2<sup>nd</sup> District by or before September 29, 2023 including all the necessary motions to support a final extension of time before removal of this case to federal jurisdiction.

-next finalize and circulate a "Bystander's Report" that first must be accepted or rejected by the Parties and if rejected by the parties to the judge for approval. (What is stated in your draft Motion to Reconsider could be viewed as an illegal video recording of the hearing

-next a usable factual draft of Allstate's Motion for summary judgment compared to our Response and then a showing of what Allstate raised in its Reply that was not touched upon in Allstate's Motion for summary judgment and Dulberg's Response that is required for a sur-reply

-next a Motion to Reconsider based upon Illinois Law ( please see a basic overview of said motion appropriate in your circumstance attached)

i had offered to meet with both Mr. Dulberg and Mr. Kost in person or by Zoom and I have tried often to explain the criteria for all actions to be taken, but obviously I have failed. i know you are angry and want vengeance for what Popovich, Mast, Balke, Baudin, Olsen, Williams and Clinton did to you but your actions are to be within the Law because no one is above the Law. I have noticed, but very seldom responded to Mr. Dulberg finding fault with my legal services, but I never claimed to be perfect and by the way that is not the standard for Legal malpractice because everyone is human and no one is perfect. I will stand behind my legal services in comparison to all the legal services your family has received for the last 50 years plus.

You told me that as your litigation expands you were bringing on another attorney to help with the burden of changing my practice notifications to no new clients and divesting my non Dulberg/Kost cases but that fell through

We discussed a retainer for your new Federal cases that I had envisioned to be partially used to bring on a new associate but that now seems to be mustard seeds that have fallen on stone and hard rock....

Please review the attached carefully so that all are fully informed and that you can see that the requirements I informed you of and you have at least partially ignored were spot on.

Finally, although i am not a wilting flower, I should receive the same respect I show to both of you, and the increasing tirades and loud shouting indicated that the respect I show is not reciprocated.

After you have had enough time to digest all this we should talk to see if there is a solution. I am not going to be available to discuss your determinations as I need a breath of fresh air and some exercise so i am going to the CBG.

Tomorrow will come fast enough.

Your anticipated cooperation is greatly appreciated,

Alphonse A. Talarico

PS: Have a nice rest of the day.

**From:** Paul Dulberg <Paul\_Dulberg@comcast.net>

**Sent:** Monday, September 18, 2023 1:06 PM

**To:** Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>

**Subject:** MOTION TO RECONSIDER ORDER ENTERED ON AUGUST 29 2023.pdf

Dear Mr Talarico,

Please find the attached file named "MOTION TO RECONSIDER ORDER ENTERED ON AUGUST 29 2023.pdf"

As noted in the beginning of the motion, the thumb drive itself is designated as "EXHIBIT A" and contains all other references to documents in the motion with the exception to anything pointing to anything previously filed with the court.

The files are currently being saved to thumb drives.

I am anticipating 11 thumb drives will be needed, one for each defendant named (9), one for the court (1) and one for you (1).

Each thumb drive takes approximately 40 minutes to create and depending on how long it actually takes either I will have them delivered to your office by end of day today or bright and early tomorrow morning.

Please confirm the number of thumb drives that will be needed.

Also, As you are well aware I would like this filed with the court as soon as possible and will pay for the costs of mailing the thumb drives.

If you see anything wrong that needs changes please let me know so we can make them asap.

Thank you,  
Paul