

Date : 11/21/2023 9:41:24 AM
From : "Alphonse Talarico"
To : "Paul Dulberg" , "Paul Dulberg" , "T Kost"
Subject : Fw: 17LA377 ROP's now filed - update appellate records
Attachment : image001.jpg; image002.png; image003.png;

From: Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>
Sent: Tuesday, November 21, 2023 9:40 AM
To: George K. Flynn <gflynn@karballaw.com>
Cc: Michelle M. Blum <mblum@KARBALLAW.com>
Subject: Re: 17LA377 ROP's now filed - update appellate records

Dear Counsel,

The point of sending you the entire string of emails between my client and the trial court administrative personnel was to alert you that the trial court clerk had obtained the two missing Reports of Proceeding from the Reporter who transcribed them but failed to file them in the trial court. They were thereafter filed as additional items in the trial court's record of the case as of November 9, 2023.

Because the trial court can, and desires to now supplement the record on Appeal to include these two missing Reports of Proceeding, as our expert had indicated in her affidavit that were missing, I sent the entire string of email to find out if you object to the Record on Appeal being supplement with them.

The trial clerk personnel indicated that she would supplement the Record on Appeal after you were notified of her intended actions and had an opportunity to object.

Sincerely

Alphonse A. Talarico
3128081410

From: George K. Flynn <gflynn@karballaw.com>
Sent: Sunday, November 19, 2023 4:38 PM
To: Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>
Cc: Michelle M. Blum <mblum@KARBALLAW.com>
Subject: Re: 17LA377 ROP's now filed - update appellate records


Counsel:


I am not aware of a filing at this time, only an innuendo.

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George K. Flynn

Karbal | Cohen | Economou | Silk | Dunne | LLC
200 S. Wacker Drive
Suite 2550
Chicago, IL 60606

 P: (312) 431-3622

 F: (312) 431-3670

 E: gflynn@karballaw.com

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From: Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>

Sent: Sunday, November 19, 2023 3:55:58 PM

To: George K. Flynn <gflynn@karballaw.com>

Subject: Re: 17LA377 ROP's now filed - update appellate records

Dear counsel,

I comprehend that you have a standing objection to any and all subsequent filing, including but not limited to this one.

Sincerely,

Alphonse A. Talarico

3128081410

3126081410

From: George K. Flynn <gflynn@karballaw.com>

Sent: Sunday, November 19, 2023 10:47 AM

To: Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>; Michelle M. Blum <mblum@KARBALLAW.com>

Subject: RE: 17LA377 ROP's now filed - update appellate records

Mr. Talarico:

The Court of Appeals has spoken multiple times as to your client's requests to "correct the record" and for additional extensions to file his brief. We object to any relief, including any additional requests for an extension. Moreover, the transcripts described below are immaterial to the appeal. We reserve all rights regarding any further delays or improper motion practice.

Regards,

George K. Flynn

Karbal | Cohen | Economou | Silk | Dunne | LLC

200 S. Wacker Drive

Suite 2550

Chicago, IL 60606



P: (312) 431-3622



F: (312) 431-3670



E: gflynn@karballaw.com

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From: Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>

Sent: Sunday, November 19, 2023 8:40 AM

To: George K. Flynn <gflynn@karballaw.com>; Michelle M. Blum <mblum@KARBALLAW.com>
Subject: Fw: 17LA377 ROP's now filed - update appellate records

Dear Counsel,

I am forwarding this email string to alert you as to what is being done to correct the Record on Appeal.

Sincerely,
Alphonse A. Talarico
3128081410
3126081410

From: Paul Dulberg <Paul_Dulberg@comcast.net>
Sent: Sunday, November 19, 2023 7:55 AM
To: Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>
Cc: Tom Kost <tkost999@gmail.com>
Subject: Re: 17LA377 ROP's now filed - update appellate records

I take it your forwarding this or should I?

On Nov 19, 2023, at 7:16 AM, Alphonse Talarico
<contact@lawofficeofalphonsetalarico.com> wrote:

Yes.

From: Paul Dulberg <Paul_Dulberg@comcast.net>
Sent: Saturday, November 18, 2023 9:09 AM
To: Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>
Cc: Tom Kost <tkost999@gmail.com>
Subject: Fwd: 17LA377 ROP's now filed - update appellate records

Mr Talarico,

Does this email request to the circuit clerk to correct/amend the record on appeal need to be forwarded to Flynn?

Rule 361. Motions in Reviewing Court
(e) Corrections. The clerk is authorized to make corrections in any document of a party to any pending case upon receipt of written request from that party together with proof that a copy of the request has been transmitted to all other parties.

Note: I have not received a response from the circuit clerk to the email request below.

Paul

Begin forwarded message:

From: Paul Dulberg <Paul_Dulberg@comcast.net>
Subject: 17LA377 ROP's now filed - update appellate records
Date: November 15, 2023 at 10:49:56 AM CST
To: McHenry County Circuit Clerk
<mchenrycircuitclerk@circuitclerkofmchenrycounty.org>
Cc: Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>, Tom Kost
<tkost999@gmail.com>

Dear Circuit Clerk,

My understanding from Judy Carlson (Court Administrator) is that 2 missing reports of proceedings (1-10-2018 and 2-27-2018) are now filed with and stamped by your office in case 17LA377.

Please forward these 2 ROP's to the clerk of the appellate court and update the previous file (ROP_Vol_1_of_1_230421_1628_8FF9DDF1.pdf) your office certified and sent the appellate court on 4-24-2023.

Of course I am willing to pay any costs or fees associated with updating the appellate courts record, Just send a link or contact me for payment.

Thank You,
Paul

Paul Dulberg
(847) 497-4250
Paul_Dulberg@comcast.net

Begin forwarded message:

From: Judy Carlson <JACarlson@22ndcircuit.illinoiscourts.gov>
Subject: RE: [EXTERNAL] Fwd: 17 LA 377
Date: November 9, 2023 at 4:02:37 PM CST
To: Paul Dulberg <pdulberg@icloud.com>

Good Afternoon, Mr. Dulberg,

Stacey has retired. I have contacted her regarding two transcripts that do not seem to be in the file, 1-10-18 and 2-27-18. I have attached the report of filed transcripts from your case and you can see that the other transcripts have been filed, as I have highlighted them.

I have reached out to Stacey and asked her to file the two missing transcripts.

I will keep you posted as to when the two transcripts get filed.
I apologize for this oversight.

Thank you and have a nice evening.

Judy Carlson, CSR
Official Court Reporter
Court Reporting Services Supervisor
2200 N. Seminary Ave. Suite 355
Woodstock, IL 60098
(815) 334-4373

From: Paul Dulberg <pdulberg@icloud.com>
Sent: Thursday, November 9, 2023 2:25 PM
To: Stacey Collins <SACollins@22ndcircuit.illinoiscourts.gov>
Cc: Judy Carlson <JACarlson@22ndcircuit.illinoiscourts.gov>
Subject: [EXTERNAL] Fwd: 17 LA 377

Dear Stacy Collins,

Please provide confirmation that you filed all of the attached PDF's of transcripts you created and sent to me with the circuit clerk on or about March 24, 2022.

If you need copies of the payment receipts for producing these reports of proceedings let me know and I will forward them to you.

Thank you,
Paul

Paul Dulberg
pdulberg@icloud.com

Begin forwarded message:

From: Stacey Collins
<SACollins@22ndcircuit.illinoiscourts.gov>
Subject: 17 LA 377
Date: March 24, 2022 at 2:22:58 PM CDT
To: Paul Dulberg <pdulberg@icloud.com>

Mr. Dulberg,

Attached please find PDF Reports of Proceedings for the following dates in the above-referenced case:

01 10 18
02 27 18
09 12 18

02 10 21
04 01 21

Stacey A. Collins
Official Court Reporter
22nd Judicial Circuit
Woodstock, IL

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While mismatches between the actual SENDER field and the FROM field are common. It is also a common spoofing tactic. For additional reference, this email was actually sent from pdulberg@icloud.com

If you have any questions about the legitimacy of this email, please call the helpdesk at extension 4828.

<image001.jpg>

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Begin forwarded message:

From: Judy Carlson <JACarlson@22ndcircuit.illinoiscourts.gov>
Subject: RE: [EXTERNAL] Fwd: 17 LA 377
Date: November 14, 2023 at 11:20:02 AM CST
To: Paul Dulberg <pdulberg@icloud.com>

Good Morning, Mr. Dulberg,

The transcripts have been filed for 1-10-18 and 2-27-18.

Thank you,

Judy Carlson, CSR
Official Court Reporter
Court Reporting Services Supervisor
2200 N. Seminary Ave. Suite 355
Woodstock, IL 60098
(815) 334-4373

From: Paul Dulberg <pdulberg@icloud.com>
Sent: Thursday, November 9, 2023 2:25 PM
To: Stacey Collins <SACollins@22ndcircuit.illinoiscourts.gov>
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Paul Dulberg
pdulberg@icloud.com

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From: Stacey Collins
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Subject: 17 LA 377
Date: March 24, 2022 at 2:22:58 PM CDT
To: Paul Dulberg <pdulberg@icloud.com>

Mr. Dulberg,

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for the following dates in the above-referenced
case:

01 10 18

02 27 18
09 12 18
02 10 21
04 01 21

Stacey A. Collins
Official Court Reporter
22nd Judicial Circuit
Woodstock, IL

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<image001.jpg>

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