

Date : 11/22/2023 10:29:34 AM

From : "Alphonse Talarico"

To : "JACarlson@22ndcircuit.illinoiscourts.gov" , "Paul Dulberg" , "Paul Dulberg" , "T Kost"

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

Attachment : image001.jpg; image002.png; image003.png;

Dear Judy Carlson, CSR.

Pursuant to your instructions to my Client Paul Dulberg, Attorney George K. Flynn has been made aware of your office's discovery of the two missing Report of Proceedings and your intent, after notification to Appellees, to supplement the Record on Appeal.

Mr. Flynn, as attorney for the Appellees objects to the supplementing of the Record on Appeal with the two missing, but now found, Report of Proceeding.

Please supplement the record on Appeal over Mr. Flynn's objection based upon said error by your office.

Sincerely,

Alphonse A. Talarico

3128081410

3126081410

From: Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>

Sent: Sunday, November 19, 2023 3:55 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

CONFIDENTIALITY NOTE:

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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

CAUTION: This email originated from outside of the County network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

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>

LEGAL CONFIDENTIAL: The information in this e-mail and in any attachment contains information which is legally privileged. It is intended only for the attention and use of the named recipient. If you are not the intended recipient, you are not authorized to retain, disclose, copy or distribute the message and/or any of its attachments. If you received this e-mail in error, please notify Stacey A. Collins, CSR, and delete this message.

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>
Cc: Judy Carlson <JACarlson@22ndcircuit.illinoiscourts.gov>
Subject: [EXTERNAL] Fwd: 17 LA 377

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Paul Dulberg
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<SACollins@22ndcircuit.illinoiscourts.gov>
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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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