

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

PAUL R. DULBERG, INDIVIDUALLY)
AND THE PAUL R. DULBERG)
REVOCABLE TRUST)

Plaintiffs,)

vs.)

KELLY N. BAUDIN *A/KIA* BAUDIN &)
BAUDIN, BAUDIN & BAUDIN AN)
ASSOCIATION OF ATTORNEYS, LAW)
OFFICES OF BAUDIN & BAUDIN,)
BAUDIN & BAUDIN LAW OFFICES,)
WILLIAM RANDAL BAUDIN II *A/K/ A*)
BAUDIN & BAUDIN, BAUDIN &)
BAUDIN AN ASSOCIATION OF)
ATTORNEYS, LAW OFFICES OF)
BAUDIN & BAUDIN, BAUDIN &)
BAUDIN LAW OFFICES, KELRAN, INC)
AIK/A THE BAUDIN LAW GROUP, Ltd.,)
JOSEPH DAVID OLSEN, *AIKJA*)
YALDEN, OLSEN & WILLETTE LAW)
OFFICES, CRAIG A WILLETTE, *A/KIA*)
YALDEN, OLSEN & WILLETTE LAW)
OFFICES, RAPHAEL E YALDEN II,)
AIK/A YALDEN, OLSEN & WILLETTE)
LAW OFFICES, ADR SYSTEMS OF)
AMERICA, LLC., ASSUMED NAME ADR)
COMMERCIAL SERVICES, ALLSTATE)
PROPERTY AND CASUALTY)
INSURANCE COMPANY)

Defendants)

CASE NO. 2022 L 010905

FILED DATE: 1/25/2024 4:26 PM 2022L010905

MOTION TO WITHDRAW AS COUNSEL

NOW COMES: Alphonse A. Talarico, attorney at law, licensed to practice before this court, to file his motion to withdraw as attorney for the Plaintiffs PAUL R. DULBERG, INDIVIDUALLY AND THE PAUL R. DULBERG REVOCABLE TRUST in this cause and as reasons for the motion state as follows:

- 1) Irreconcilable differences regarding the preparation of this matter for hearings have arisen between this attorney and his clients herein;
- 2) There exists and has existed for some time a lack of communication and meaningful communication between this attorney and his clients herein;
- 3) The clients have not afforded this attorney herein adequate cooperation necessary to properly prepare the cause of the client and a difference of opinion appears to exist between clients and attorney as to the conduct of this matter;
- 4) That the clients were given notice of this Motion electronically at three email addresses that have been used by the clients for over two years and in accordance with Illinois Supreme Court Rule 13(c)(2);
- 5) Pursuant to the Rules of Professional Conduct 1.16(a)(1) the clients have insisted upon a course of unprofessional conduct that the attorney cannot comply with;
- 6) Pursuant to the Rules of Professional Conduct 1.16(b)(2) the clients have persisted in a course of action involving the lawyer's services that the lawyer reasonably believes is fraudulent;
- 7) Pursuant to the Rules of Professional Conduct 1.16 (b)(5) the client failed substantially to fulfill an obligation to the lawyer regarding the lawyer's services and has been given reasonable warning that the lawyer will withdraw unless the obligation is fulfilled;
- 8) pursuant to the Rules of Professional Conduct 1.16 (b)(6) the representation will

result in an unreasonable financial burden on the lawyer;

9) pursuant to the Rules of Professional Conduct 1.16 (b)(7) other good cause for the withdrawal exists;

10) The last known address of Plaintiff Paul R. Dulberg is 4606 Hayden Ct. , McHenry, Illinois 60051;

11) The last known address of Plaintiff the Paul R. Dulberg Revocable Trust is Thomas W. Kost Trustee 423 Dempster St. Mt. Prospect, Ill. 60056

To insure notice of any action in this case Paul R. Dulberg and the Paul R. Dulberg Revocable Trust should retain other counsel herein or file with the clerk of the court, within 21 days after the entry of the order of withdrawal, their supplementary appearances stating an address at which service of notices or other papers may be had upon them.

Notice of Withdrawal has been served on all parties of record and on Paul R. Dulberg and the Paul R. Dulberg Revocable Trust electronically pursuant to Supreme Court Rule 13(c)(2) with reasonable notice of the time and place of the presentation of this motion for leave to withdraw.

Wherefore, Alphonse A. Talarico prays that his motion to withdraw be granted and that Paul R. Dulberg and the Paul R. Dulberg Revocable Trust be granted enough time, not less than 21 days, to retain other counsel or file with the Clerk of Court their appearances stating an address at which service of notices or other documents may be had upon him.

Respectfully Submitted

/s/Alphonse A Talarico

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