



T Kost &lt;tkost999@gmail.com&gt;

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**Kost v. Mt. Prospect et al 2023CH04351**

2 messages

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

Thu, Dec 28, 2023 at 11:55 AM

To: Paul Dulberg &lt;pdulberg@icloud.com&gt;, Paul Dulberg &lt;Paul\_Dulberg@comcast.net&gt;, T Kost &lt;tkost999@gmail.com&gt;

Gentlemen,

It is my advise to abandoned the potential strategy of filing a Motion to Reconsider, after many days of research, in conjunction with multiple research assistants I retain through my subscription to Thompson Reuters, finding no authority about the different /increased (not shifted) burden oof proof that resulted by Judge Loftus indication we can fight against an eminent domain action when it happens but not now. The only 3 criteria in Illinois for bringing such a motion: new law; error in law; and newly discovered evidence that was not available before - cannot be met.

Therefore i advise the filing and serving of a Notice of Appeal supplemented by my bystander's report to be able to use all our arguments.

Violation of a 14<sup>th</sup> amendment right  
violation of due process right  
defendants violation of the required procedures to establish a TIF are

I would like to file the Notice of Appeal today or tomorrow as it is the first deadline upcoming.

Your anticipated cooperation is greatly appreciated,

Alphonse A. Talarico  
3126081413128081410

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**T Kost** <tkost999@gmail.com>

Thu, Dec 28, 2023 at 2:37 PM

To: Alphonse Talarico &lt;contact@lawofficeofalphonsetalarico.com&gt;

Cc: Paul Dulberg &lt;pdulberg@icloud.com&gt;, Paul Dulberg &lt;Paul\_Dulberg@comcast.net&gt;

Then I agree. Let's remember the Dulberg Supreme Court filing is top priority so let's make sure we leave ourselves sufficient time for it.

[Quoted text hidden]