


**From:** Alphonse Talarico contact@lawofficeofalphonsetalarico.com   
**Subject:** Joining an Appeal Filed October 31, 2023 , Accepted December 5, 2023 after filing a separate Appeal  
**Date:** December 6, 2023 at 12:58 PM  
**To:** Paul Dulberg pdulberg@icloud.com, Paul Dulberg Paul\_Dulberg@comcast.net, T Kost tkost999@gmail.com

---

AT

Gentlemen,

Please see the attached.

Please Notice the envelope numbers are the same proving this is one.

Alphonse A. Talarico Esq.  
3126081410  
3128081410

Joining an  
Appeal.pdf  
[25.5 MB](#)

Filing Accepted for Case: 1-23-1142; PAUL R. DULBERG v. KELLY N. BAUDIN a/k/a BAUDIN & BAUDIN; Envelope Number: 25022623

From: no-reply@efilingmail.tylertech.cloud

To: alphonsetalarico@yahoo.com

Date: Tuesday, December 5, 2023 at 11:16 AM CST



ODYSSEY  
**eFileLL**™

## Filing Accepted

Envelope Number: 25022623

Case Number: 1-23-1142

Case Name: PAUL R. DULBERG v. KELLY N.  
BAUDIN a/k/a BAUDIN & BAUDIN

The filing below was reviewed and has been accepted by the clerk's office. You may access the file stamped copy of the document filed by clicking on the below link.

Filing Details	
Court	Appellate Court – 1st District
Case Number	1-23-1142
Case Name	PAUL R. DULBERG v. KELLY N. BAUDIN a/k/a BAUDIN & BAUDIN
Date/Time Submitted	10/31/2023 5:07 PM CST
Date/Time Accepted	12/5/2023 11:16 AM CST
Accepted Comments	
Filing Type	EFileAndServe
Filing Description	Notice of Filing
Filing Code	*Notice of Filing - Notice of Joining in Appeal
Filed By	Alphonse Talarico
Filing Attorney	Alphonse Talarico

Document Details	
Lead Document	10312023 NOF.pdf
Lead Document Page Count	5
File Stamped Copy	<a href="#">Download Document</a>
This link is active for 548 days.	

If the link above is not accessible, copy this URL into your browser's address bar to view the document:  
<https://illinois.tylertech.cloud/ViewDocuments.aspx?FID=9e8fea14-06d4-40a2-9b75-e0818c6e77fe>

If you are not represented by a lawyer, we want to improve your e-filing experience. Please [click here](#) to fill out a short survey.

**Please Note:** If you have not already done so, be sure to add yourself as a service contact on this case in order to receive eService.

For technical assistance, contact your service provider

Odyssey File & Serve

(800) 297-5377

Please do not reply to this email. It was automatically generated.

APPEAL TO THE APPELLATE COURT OF ILLINOIS FOR THE FIRST

JUDICIAL DISTRICT No. 1-23-1142

FROM THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

COUNTY DEPARTMENT, LAW DIVISION

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

Plaintiffs-Appellants

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 *IIA/KI A*  
BAUDIN & BAUDIN, BAUDIN & BAUDIN  
AN ASSOCIATION OF ATTORNEYS, LAW  
OFFICES OF BAUDIN & BAUDIN, BAUDIN  
& BAUDIN LAW OFFICES, KELRAN, INC  
*AI.KIA* 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, *AI.KIA* YALDEN,  
OLSEN & WILLETTE LAW OFFICES, ADR  
SYSTEMS OF AMERICA, LLC., ASSUMED  
NAME ADR COMMERCIAL SERVICES,  
ALLSTATE PROPERTY AND CASUALTY  
INSURANCE COMPANY

Defendants-Appellees

CASE NO. 2022L010905



NOTICE OF FILING NOTICE OF JOINING  
AN APPEAL

**TO: The Clerk of the APPELLATE COURT OF ILLINOIS for the FIRST JUDICIAL DISTRICT and Attorneys of Record (Please see the attached Service List)**

**PLEASE TAKE NOTICE THAT PLAINTIFFS-APPELLANTS PAUL R.**

**DULBERG AND THE PAUL R. DULBERG REVOCABLE TRUST** in the above-entitled cause, have pursuant to Illinois Supreme Court Rule 301, filed with the Clerk of the Circuit Court of Cook County, Illinois on October 31, 2023 their Notice of Filing Notice of Joining an Appeal from the orders of the Circuit Court entered in the above-entitled cause. A copy of said Notice of Filing Notice of Joining an Appeal was previously served upon the Attorneys of Record on October 19 2023 and is again herewith served upon you.

October 31, 2023

By: /s/ Alphonse A. Talarico  
ALPHONSE A. TALARICO

Attorney for Plaintiffs-Appellants  
Law Office of Alphonse A. Talarico  
ARDC No. 6184530  
CC 53293  
707 Skokie Boulevard, Suite 600  
Northbrook, Illinois 60062  
(312) 808-1410

Attorney for Plaintiffs  
contact@lawofficeofalphonsetalarico.com

**PROOF OF SERVICE**

I, the undersigned attorney, certify that this Notice of Filing Notice of Joining an Appeal was served on **The Clerk of the APPELLATE COURT OF ILLINOIS for the FIRST JUDICIAL DISTRICT and Attorneys of Record** listed on the attached **Service List** by an approved electronic filing service provider (EFSP) on October 31, 2023 at 4:30 p.m. Under penalties as provided by law pursuant to 735 ILCS 5/1-109, I certify that everything set forth in this Proof of Service is true and correct. I understand that making a false statement on this form is perjury and has penalties provided by law under 735 ILCS 5/1-109.

/s/ Alphonse A. Talarico  
Alphonse A. Talarico

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION  
2022L010905**

**SERVICE LIST**

Jason W. Jochum  
George J. Manos  
LEWIS BRISBOIS BISGAARD & SMITH LLP  
550 West Adams Street, Suite 300  
Chicago, Illinois 60661  
P: (312) 345-1718/F: (312) 345-1778  
Jason.Jochum@lewisbrisbois.com  
George.Manos@lewisbrisbois.com  
Zachary.McGourty@lewisbrisbois.com

Robert A. Chapman  
CHAPMAN SPINGOLA, LLP  
190 South LaSalle Street, Suite 3850  
Chicago, Illinois 60603  
P:(312) 630-9202  
F:(312) 630-9233  
rchapman@chapmanspingola.com  
wdickmann@chapmanspingola.com

Christine V. Anto  
Amundsen Davis, LLC  
150 North Michigan Avenue, Suite 3300  
Chicago, Illinois 60601  
P: (312) 894-3200  
canto@amundsendavislaw.com



mtinajero@amundsendavislaw.com  
JSchuth@amundsendavislaw.com

Jeremy N. Boeder  
Tribler Orpett & Meyer, P.C.  
225 W. Washington Street, Suite 2550  
Chicago, Illinois 60606  
jnboeder@tribler.com  
docket@tribler.com



<b>Instructions</b> Check the box to the right if your case involves parental responsibility or parenting time (custody/visitation rights) or relocation of a child.  Just below "Appeal to the Appellate Court of Illinois," enter the number of the appellate district that will hear the appeal and the county of the trial court.  If the case name in the trial court began with "In re" (for example, "In re Marriage of Jones"), enter that name. Below that, enter the names of the parties in the trial court, and check the correct boxes to show which party is filing the appeal ("appellant") and which party is responding to the appeal ("appellee").  To the far right, enter the trial court case number, the trial judge's name, and the Supreme Court Rule that allows the appellate court to hear the appeal.	<input type="checkbox"/> <b>THIS APPEAL INVOLVES A MATTER SUBJECT TO EXPEDITED DISPOSITION UNDER RULE 311(a).</b>  <b>APPEAL TO THE APPELLATE COURT OF ILLINOIS</b>  FIRST _____ District _____ from the Circuit Court of _____ Cook _____ County _____  In re _____  Paul R. Dulberg and The Paul R. Dulberg Revocable Trust  Plaintiffs/Petitioners (First, middle, last names) <input checked="" type="checkbox"/> Appellants <input type="checkbox"/> Appellees  v.  Kelly N. Baudin et al., Joseph David Olsen et al., ADR Systems Of America L.L.C. Allstate Property and Casualty Insurance Company  Defendants/Respondents (First, middle, last names) <input type="checkbox"/> Appellants <input checked="" type="checkbox"/> Appellees	<b>FILED</b> 10/19/2023 8:36 PM IRIS Y. MARTINEZ CIRCUIT CLERK COOK COUNTY, IL 2022L010905 24869576  Trial Court Case No.: 2022 L 010905  Honorable Michael F. Otto Judge, Presiding  Supreme Court Rule: 301
--	--	---

### NOTICE OF APPEAL (CIVIL)

In 1, check the type of appeal.  
For more information on choosing a type of appeal, see *How to File a Notice of Appeal*.

#### 1. Type of Appeal:

- ☐ Appeal  
☐ Interlocutory Appeal  
☒ Joining Prior Appeal  
☐ Separate Appeal  
☐ Cross Appeal

In 2, list the name of each person filing the appeal and check the proper box for each person.

#### 2. Name of Each Person Appealing:

Name: Paul R. Dulberg  
First Middle Last

- ☒ Plaintiff-Appellant ☐ Petitioner-Appellant

OR

- ☐ Defendant-Appellant ☐ Respondent-Appellant

Name: The Paul R. Dulberg Revocable Trust  
First Middle Last  
☒ Plaintiff-Appellant ☐ Petitioner-Appellant  
OR  
☐ Defendant-Appellant ☐ Respondent-Appellant

In 3, identify every order or judgment you want to appeal by listing the date the trial court entered it.

3. List the date of every order or judgment you want to appeal:

05/25/2023  
Date  
08/29/2023  
Date  
09/21/2023  
Date

In 4, state what you want the appellate court to do. You may check as many boxes as apply.

4. State your relief:

- ☒ reverse the trial court's judgment (*change the judgment in favor of the other party into a judgment in your favor*) and ☒ send the case back to the trial court for any hearings that are still required;
- ☒ vacate the trial court's judgment (*erase the judgment in favor of the other party*) and ☒ send the case back to the trial court for a new hearing and a new judgment;
- ☒ change the trial court's judgment to say: Transcript of 9/21/23 and order of May 25, 2023 are in opposite and trial court statement that the case is over regarding all Defendants is incorrect,
- ☒ order the trial court to: acknowledge that Fraud (and Fraud on the Court) is alleged, that the Statute of Limitations began to run on October 28, 2022 pursuant to the "Discovery Rule", that Dulberg was legally disabled at all times herein, the automatic BK stay was
- ☒ other: violated, allow Appellants to supplement Record on Appeal to include a bystanders report showing that the Baudin Defendants refused 304(a) language in the 8/2923 order ect and grant any other relief that the court finds appropriate.

If you are completing this form on a computer, sign your name by typing it. If you are completing it by hand, sign by hand and print your name. Fill in your address, telephone number, and email address, if you have one.

/s/ Paul R. Dulberg 4606 Hayden Ct.  
Your Signature Street Address  
Paul R. Dulberg McHenry, IL 60051  
Your Name City, State, ZIP  
Paul R. dulberg@comcast.net (847) 497-4250   
Email Telephone Attorney # (if any)

Additional Appellant Signature

/s/ Thomas W. Kost, Trustee 423 Dempster St.  
Signature Street Address  
Thomas W. Kost Mt. Prospect, IL 60056  
Name City, State, ZIP  
tkost999@gmail.com (847) 439-2198   
Email Telephone Attorney # (if any)

All appellants must sign this form. Have each additional appellant sign the form here and enter their complete name, address, telephone number, and email address, if they have one.

**GETTING COURT DOCUMENTS BY EMAIL:** You should use an email account that you do not share with anyone else and that you check every day. If you do not check your email every day, you may miss important information, notice of court dates, or documents from other parties.



**PROOF OF SERVICE (You must serve the other party and complete this section)**

In 1a, enter the name, mailing address, and email address of the party or lawyer to whom you sent the document.

In 1b, check the box to show how you sent the document, and fill in any other information required on the blank lines.

In 1b, check the box to show how you are sending the document.

**CAUTION:** If you and the person you are sending the document to have an email address, you **must** use one of the first two options. Otherwise, you may use one of the other options.

In c, fill in the date and time that you sent the document.

In 2, if you sent the document to more than 1 party or lawyer, fill in a, b, and c. Otherwise leave 2 blank.

## 1. I sent this document:

a. To:

Name: Jeremy N. BoederFirstMiddleLastAddress: 225 W. Washington St. #2550 Chicago Illinois 60606Street, Apt #CityStateZIPEmail address: jnboeder@tribler.com

b. By:

☒ An approved electronic filing service provider (EFSP)☐ Email (not through an EFSP)

Only use one of the methods below if you do not have an email address, or the person you are sending the document to does not have an email address.

☐ Personal hand delivery to:☐ The party☐ The party's family member who is 13 or older, at the party's residence☐ The party's lawyer☐ The party's lawyer's office☐ Mail or third-party carrierc. On: 10/19/2023DateAt: 4:55☐ a.m.☒ p.m.Time

## 2. I sent this document:

a. To:

Name: Jason W. JochumFirstMiddleLastAddress: 550 W. Adams St. #300 Chicago Illinois 60661Street, Apt #CityStateZIPEmail address: Jason.Jochum@lewisbrisbois.com

b. By:

☒ An approved electronic filing service provider (EFSP)☐ Email (not through an EFSP)

Only use one of the methods below if you do not have an email address, or the person you are sending the document to does not have an email address.

☐ Personal hand delivery to:☐ The party☐ The party's family member who is 13 or older, at the party's residence☐ The party's lawyer☐ The party's lawyer's office☐ Mail or third-party carrierc. On: 10/19/2023DateAt: 4:55☐ a.m.☒ p.m.Time

In 3, if you sent the document to more than 1 party or lawyer, fill in a, b, and c. Otherwise leave 2 blank.

3. I sent this document:

a. To:

Name: Robert A. Chapman

First

Middle

Last

Address: 190 S. LaSalle St.#3850 Chicago, Illinois 60603

Street, Apt #

City

State

ZIP

Email address: rchapman@chapmanspingola.com

b. By:

☒ An approved electronic filing service provider (EFSP)

☐ Email (not through an EFSP)

Only use one of the methods below if you do not have an email address, or the person you are sending the document to does not have an email address.

☐ Personal hand delivery to:

☐ The party

☐ The party's family member who is 13 or older, at the party's residence

☐ The party's lawyer

☐ The party's lawyer's office

☐ Mail or third-party carrier

c. On: 10/19/2023

Date

At: 4:55

☐ a.m.

☒ p.m.

Time

Under the Code of Civil Procedure, 735 ILCS 5/1-109, making a statement on this form that you know to be false is perjury, a Class 3 Felony.

If you are completing this form on a computer, sign your name by typing it. If you are completing it by hand, sign by hand and print your name.

I certify that everything in the Proof of Service is true and correct. I understand that making a false statement on this form is perjury and has penalties provided by law under 735 ILCS 5/1-109.

/s/ Alphonse A. Talarico

Your Signature

Alphonse A. Talarico

Print Your Name

6184530

Attorney # (if any)



**ADDITIONAL PROOF OF SERVICE**

In **1a**, enter the name, mailing address, and email address of the party or lawyer to whom you sent the document.

**1. I sent this document:**

**a. To:**

Name: Christine V. Anto  
*First Middle Last*

Address: 150 N. Michigan Ave. #3300 Chicago Illinois 60601  
*Street, Apt # City State ZIP*

Email address: canto@amundsendavislaw.com

In **1b**, check the box to show how you are sending the document.  
**CAUTION:** If you and the person you are sending the document to have an email address, you **must** use one of the first two options. Otherwise, you may use one of the other options.

**b. By:**

- ☒ An approved electronic filing service provider (EFSP)
- ☐ Email *(not through an EFSP)*  
*Only use one of the methods below if you do not have an email address, or the person you are sending the document to does not have an email address.*
- ☐ Personal hand delivery to:
- ☐ The party
  - ☐ The party's family member who is 13 or older, at the party's residence
  - ☐ The party's lawyer
  - ☐ The party's lawyer's office
- ☐ Mail or third-party carrier

In **c**, fill in the date and time that you sent the document.

**c. On:** 10/19/2023  
*Date*

**At:** 4:50 ☐ a.m. ☒ p.m.  
*Time*

1-23-1142

FILED  
10/19/2023 8:36 PM  
IRIS Y. MARTINEZ  
CIRCUIT CLERK  
COOK COUNTY, IL  
2022L010905  
24869576

APPEAL TO THE APPELLATE COURT OF ILLINOIS FOR THE FIRST

JUDICIAL DISTRICT No. 1-23-1142

FROM THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

COUNTY DEPARTMENT, LAW DIVISION

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

Plaintiffs-Appellants

vs.

KELLYN. 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/KIA  
BAUDIN & BAUDIN, BAUDIN & BAUDIN  
AN ASSOCIATION OF ATTORNEYS, LAW  
OFFICES OF BAUDIN & BAUDIN, BAUDIN  
& BAUDIN LAW OFFICES, KELRAN, INC  
A/KIA THE BAUDIN LAW GROUP, Ltd.,  
JOSEPH DAVID OLSEN, A/KIA YALDEN,  
OLSEN & WILLETTE LAW OFFICES,  
CRAIG A WILLETTE, A/KIA YALDEN,  
OLSEN & WILLETTE LAW OFFICES,  
RAPHAEL E YALDEN II, A/KIA YALDEN,  
OLSEN & WILLETTE LAW OFFICES, ADR  
SYSTEMS OF AMERICA, LLC., ASSUMED  
NAME ADR COMMERCIAL SERVICES,  
ALLSTATE PROPERTY AND CASULTY  
INSURANCE COMPANY

Defendants-Appellees

CASE NO. 2022L010905



NOTICE OF FILING NOTICE OF APPEAL

**TO: All Attorneys of Record (Please see the attached Service List)**

**PLEASE TAKE NOTICE THAT PLAINTIFFS-APPELLANTS PAUL R.**

**DULBERG AND THE PAUL R. DULBERG REVOCABLE TRUST** in the above-entitled cause, have pursuant to Illinois Supreme Court Rule 301, filed with the Clerk of the Circuit Court of Cook County, Illinois on October 19, 2023 their Notice of Appeal from the orders of the Circuit Court entered in the above-entitled cause. A copy of said Notice of Appeal is herewith served upon you.

October 19, 2023

By: /s/ Alphonse A. Talarico  
ALPHONSE A. TALARICO

Attorney for Plaintiffs-Appellants  
Law Office of Alphonse A. Talarico  
ARDC No. 6184530  
CC 53293  
707 Skokie Boulevard, Suite 600  
Northbrook, Illinois 60062  
(312) 808-1410  
Attorney for Plaintiffs  
contact@lawofficeofalphonsetalarico.com

**PROOF OF SERVICE**

I, the undersigned attorney, certify that this Notice was served to all parties listed on the attached **Service List** by an approved electronic filing service provider (EFSP) on October 19, 2023 at 4:30 p.m. Under penalties as provided by law pursuant to 735 ILCS 5/1-109, I certify that everything set forth in this Proof of Service is true and correct. I understand that making a false statement on this form is perjury and has penalties provided by law under 735 ILCS 5/1-109.

/s/ Alphonse A. Talarico  
Alphonse A. Talarico



IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION  
2022L010905

SERVICE LIST

Jason W. Jochum  
George J. Manos  
LEWIS BRISBOIS BISGAARD & SMITH LLP  
550 West Adams Street, Suite 300  
Chicago, Illinois 60661  
P: (312) 345-1718/F: (312) 345-1778  
Jason.Jochum@lewisbrisbois.com  
George.Manos@lewisbrisbois.com  
Zachary.McGourty@lewisbrisbois.com

Robert A. Chapman  
CHAPMAN SPINGOLA, LLP  
190 South LaSalle Street, Suite 3850  
Chicago, Illinois 60603  
P:(312) 630-9202  
F:(312) 630-9233  
rchapman@chapmanspingola.com  
wdickmann@chapmanspingola.com

Christine V. Anto  
Amundsen Davis, LLC  
150 North Michigan Avenue, Suite 3300  
Chicago, Illinois 60601  
P: (312) 894-3200  
canto@amundsendavislaw.com

mtinajero@amundsendavislaw.com  
JSchuth@amundsendavislaw.com

Jeremy N. Boeder  
Tribler Orpett & Meyer, P.C.  
225 W. Washington Street, Suite 2550  
Chicago, Illinois 60606  
jnboeder@tribler.com  
docket@tribler.com



Filing Submitted for Case: 1-23-1142; PAUL R. DULBERG v. KELLY N. BAUDIN a/k/a BAUDIN & BAUDIN; Envelope Number: 25022623

From: no-reply@efilingmail.tylertech.cloud (no-reply@efilingmail.tylertech.cloud)

To: alphonsetalarico@yahoo.com

Date: Tuesday, October 31, 2023 at 05:07 PM CDT



ODYSSEY  
**eFileLL**™

## Filing Submitted

Envelope Number: 25022623

Case Number: 1-23-1142

Case Name: PAUL R. DULBERG v. KELLY N.  
BAUDIN a/k/a BAUDIN & BAUDIN

The filing below has been submitted to the clerk's office for review and assigned **Envelope Number: 25022623**. You will be notified by email in 24-48 hours if your filing has been accepted or rejected.

Filing Details	
<b>Court</b>	Appellate Court – 1st District
<b>Date/Time Submitted</b>	10/31/2023 5:07 PM CST
<b>Filing Type</b>	EFileAndServe
<b>Filing Description</b>	Notice of Filing Notice of Joining an Appeal
<b>Filing Code</b>	Notice of Filing
<b>Filed By</b>	Alphonse Talarico
<b>Filing Attorney</b>	Alphonse Talarico

Fee Details	
Your account is never charged until your filing is accepted. If you see any pending charges on your account prior to acceptance, this is an authorization hold to ensure the funds are available so your filing can be accepted without delay.	
If the filing is canceled or rejected these funds will be released and will return to your account according to your financial institution's policies (typically 3-10 business days).	
This envelope is pending review and fees may change.	
Case Fee Information	\$0.00
Notice of Filing	\$0.00
<b>Total:</b> \$0.00 (The envelope still has pending filings and the fees are subject to change)	

Document Details	
<b>Lead Document</b>	10312023 NOF.pdf

<b>Lead Document Page Count</b>	5
<b>File Copy</b>	<a href="#">Download Document</a>
This link is active for 548 days.	

If the link above is not accessible, copy this URL into your browser's address bar to view the document:  
<https://illinois.tylertech.cloud/ViewDocuments.aspx?FID=9e8fea14-06d4-40a2-9b75-e0818c6e77fe>

If you are not represented by a lawyer, we want to improve your e-filing experience. Please [click here](#) to fill out a short survey.

For technical assistance, contact your service provider

Odyssey File & Serve

(800) 297-5377

Please do not reply to this email. It was automatically generated.



APPEAL TO THE APPELLATE COURT OF ILLINOIS FOR THE FIRST

JUDICIAL DISTRICT No. 1-23-1142

FROM THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

COUNTY DEPARTMENT, LAW DIVISION

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

Plaintiffs-Appellants

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 *IIA/KI A*  
BAUDIN & BAUDIN, BAUDIN & BAUDIN  
AN ASSOCIATION OF ATTORNEYS, LAW  
OFFICES OF BAUDIN & BAUDIN, BAUDIN  
& BAUDIN LAW OFFICES, KELRAN, INC  
*AI.KIA* 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, *AI.KIA* YALDEN,  
OLSEN & WILLETTE LAW OFFICES, ADR  
SYSTEMS OF AMERICA, LLC., ASSUMED  
NAME ADR COMMERCIAL SERVICES,  
ALLSTATE PROPERTY AND CASUALTY  
INSURANCE COMPANY

CASE NO. 2022L010905

Defendants-Appellees

NOTICE OF FILING NOTICE OF JOINING  
AN APPEAL

**TO: The Clerk of the APPELLATE COURT OF ILLINOIS for the FIRST JUDICIAL DISTRICT and Attorneys of Record (Please see the attached Service List)**

**PLEASE TAKE NOTICE THAT PLAINTIFFS-APPELLANTS PAUL R.**

**DULBERG AND THE PAUL R. DULBERG REVOCABLE TRUST** in the above-entitled cause, have pursuant to Illinois Supreme Court Rule 301, filed with the Clerk of the Circuit Court of Cook County, Illinois on October 31, 2023 their Notice of Filing Notice of Joining an Appeal from the orders of the Circuit Court entered in the above-entitled cause. A copy of said Notice of Filing Notice of Joining an Appeal was previously served upon the Attorneys of Record on October 19 2023 and is again herewith served upon you.

October 31, 2023

By: /s/ Alphonse A. Talarico  
ALPHONSE A. TALARICO

Attorney for Plaintiffs-Appellants  
Law Office of Alphonse A. Talarico  
ARDC No. 6184530  
CC 53293  
707 Skokie Boulevard, Suite 600  
Northbrook, Illinois 60062  
(312) 808-1410

Attorney for Plaintiffs  
contact@lawofficeofalphonsetalarico.com

**PROOF OF SERVICE**

I, the undersigned attorney, certify that this Notice of Filing Notice of Joining an Appeal was served on **The Clerk of the APPELLATE COURT OF ILLINOIS for the FIRST JUDICIAL DISTRICT and Attorneys of Record** listed on the attached **Service List** by an approved electronic filing service provider (EFSP) on October 31, 2023 at 4:30 p.m. Under penalties as provided by law pursuant to 735 ILCS 5/1-109, I certify that everything set forth in this Proof of Service is true and correct. I understand that making a false statement on this form is perjury and has penalties provided by law under 735 ILCS 5/1-109.

/s/ Alphonse A. Talarico  
Alphonse A. Talarico



**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS**  
**COUNTY DEPARTMENT, LAW DIVISION**  
**2022L010905**

**SERVICE LIST**

Jason W. Jochum  
George J. Manos  
LEWIS BRISBOIS BISGAARD & SMITH LLP  
550 West Adams Street, Suite 300  
Chicago, Illinois 60661  
P: (312) 345-1718/F: (312) 345-1778  
Jason.Jochum@lewisbrisbois.com  
George.Manos@lewisbrisbois.com  
Zachary.McGourty@lewisbrisbois.com

Robert A. Chapman  
CHAPMAN SPINGOLA, LLP  
190 South LaSalle Street, Suite 3850  
Chicago, Illinois 60603  
P:(312) 630-9202  
F:(312) 630-9233  
rchapman@chapmanspingola.com  
wdickmann@chapmanspingola.com

Christine V. Anto  
Amundsen Davis, LLC  
150 North Michigan Avenue, Suite 3300  
Chicago, Illinois 60601  
P: (312) 894-3200  
canto@amundsendavislaw.com

mtinajero@amundsendavislaw.com  
JSchuth@amundsendavislaw.com

Jeremy N. Boeder  
Tribler Orpett & Meyer, P.C.  
225 W. Washington Street, Suite 2550  
Chicago, Illinois 60606  
jnboeder@tribler.com  
docket@tribler.com

FILED DATE: 10/19/2023 8:36 PM 2022L010905

Instructions ▼	<input type="checkbox"/> THIS APPEAL INVOLVES A MATTER SUBJECT TO EXPEDITED DISPOSITION UNDER RULE 311(a).	FILED 10/19/2023 8:36 PM IRIS Y. MARTINEZ CIRCUIT CLERK COOK COUNTY, IL 2022L010905 24869576
Check the box to the right if your case involves parental responsibility or parenting time (custody/visitation rights) or relocation of a child.	<b>APPEAL TO THE APPELLATE COURT OF ILLINOIS</b>	
Just below "Appeal to the Appellate Court of Illinois," enter the number of the appellate district that will hear the appeal and the county of the trial court.	FIRST _____ District _____ from the Circuit Court of _____ Cook _____ County _____	
If the case name in the trial court began with "In re" (for example, "In re Marriage of Jones"), enter that name. Below that, enter the names of the parties in the trial court, and check the correct boxes to show which party is filing the appeal ("appellant") and which party is responding to the appeal ("appellee").	In re _____ Paul R. Dulberg and The Paul R. Dulberg Revocable Trust Plaintiffs/Petitioners (First, middle, last names) <input checked="" type="checkbox"/> Appellants <input type="checkbox"/> Appellees v. Kelly N. Baudin et al., Joseph David Olsen et al., ADR Systems Of America L.L.C. Allstate Property and Casualty Insurance Company Defendants/Respondents (First, middle, last names) <input type="checkbox"/> Appellants <input checked="" type="checkbox"/> Appellees	Trial Court Case No.: 2022 L 010905  Honorable Michael F. Otto Judge, Presiding  Supreme Court Rule: 301
To the far right, enter the trial court case number, the trial judge's name, and the Supreme Court Rule that allows the appellate court to hear the appeal.		

### NOTICE OF APPEAL (CIVIL)

In 1, check the type of appeal.  
For more information on choosing a type of appeal, see *How to File a Notice of Appeal*.

#### 1. Type of Appeal:

- ☐ Appeal  
☐ Interlocutory Appeal  
☒ Joining Prior Appeal  
☐ Separate Appeal  
☐ Cross Appeal

In 2, list the name of each person filing the appeal and check the proper box for each person.

#### 2. Name of Each Person Appealing:

Name: Paul R. Dulberg  
First Middle Last

- ☒ Plaintiff-Appellant ☐ Petitioner-Appellant  
OR  
☐ Defendant-Appellant ☐ Respondent-Appellant



Name: The Paul R. Dulberg Revocable Trust

First

Middle

Last

☒ Plaintiff-Appellant☐ Petitioner-Appellant

OR

☐ Defendant-Appellant☐ Respondent-Appellant

In 3, identify every order or judgment you want to appeal by listing the date the trial court entered it.

## 3. List the date of every order or judgment you want to appeal:

05/25/2023

Date

08/29/2023

Date

09/21/2023

Date

In 4, state what you want the appellate court to do. You may check as many boxes as apply.

## 4. State your relief:

- ☒ reverse the trial court's judgment (*change the judgment in favor of the other party into a judgment in your favor*) and ☒ send the case back to the trial court for any hearings that are still required;
- ☒ vacate the trial court's judgment (*erase the judgment in favor of the other party*) and ☒ send the case back to the trial court for a new hearing and a new judgment;
- ☒ change the trial court's judgment to say: Transcript of 9/21/23 and order of May 25, 2023 are in opposite and trial court statement that the case is over regarding all Defendants is incorrect,
- ☒ order the trial court to: acknowledge that Fraud (and Fraud on the Court) is alleged, that the Statute of Limitations began to run on October 28, 2022 pursuant to the "Discovery Rule", that Dulberg was legally disabled at all times herein, the automatic BK stay was
- ☒ other: violated, allow Appellants to supplement Record on Appeal to include a bystanders report showing that the Baudin Defendants refused 304(a) language in the 8/2923 order ect and grant any other relief that the court finds appropriate.

If you are completing this form on a computer, sign your name by typing it. If you are completing it by hand, sign by hand and print your name. Fill in your address, telephone number, and email address, if you have one.

/s/ Paul R. Dulberg  
Your Signature4606 Hayden Ct.  
Street AddressPaul R. Dulberg  
Your NameMcHenry, IL 60051  
City, State, ZIPPaul R. dulberg@comcast.net  
Email(847) 497-4250  
Telephone

Attorney # (if any)

## Additional Appellant Signature

/s/ Thomas W. Kost, Trustee  
Signature423 Dempster St.  
Street AddressThomas W. Kost  
NameMt. Prospect, IL 60056  
City, State, ZIPtkost999@gmail.com  
Email(847) 439-2198  
Telephone

Attorney # (if any)

**GETTING COURT DOCUMENTS BY EMAIL:** You should use an email account that you do not share with anyone else and that you check every day. If you do not check your email every day, you may miss important information, notice of court dates, or documents from other parties.

**PROOF OF SERVICE (You must serve the other party and complete this section)**

In 1a, enter the name, mailing address, and email address of the party or lawyer to whom you sent the document.

In 1b, check the box to show how you sent the document, and fill in any other information required on the blank lines.

In 1b, check the box to show how you are sending the document.  
**CAUTION:** If you and the person you are sending the document to have an email address, you **must** use one of the first two options. Otherwise, you may use one of the other options.

In c, fill in the date and time that you sent the document.

In 2, if you sent the document to more than 1 party or lawyer, fill in a, b, and c. Otherwise leave 2 blank.

## 1. I sent this document:

## a. To:

Name: Jeremy N. BoederFirstMiddleLastAddress: 225 W. Washington St. #2550 Chicago Illinois 60606Street, Apt #CityStateZIPEmail address: jnboeder@tribler.com

## b. By:

☒ An approved electronic filing service provider (EFSP)☐ Email (not through an EFSP)*Only use one of the methods below if you do not have an email address, or the person you are sending the document to does not have an email address.*☐ Personal hand delivery to:☐ The party☐ The party's family member who is 13 or older, at the party's residence☐ The party's lawyer☐ The party's lawyer's office☐ Mail or third-party carrierc. On: 10/19/2023DateAt: 4:55☐ a.m.☒ p.m.Time

## 2. I sent this document:

## a. To:

Name: Jason W. JochumFirstMiddleLastAddress: 550 W. Adams St. #300 Chicago Illinois 60661Street, Apt #CityStateZIPEmail address: Jason.Jochum@lewisbrisbois.com

## b. By:

☒ An approved electronic filing service provider (EFSP)☐ Email (not through an EFSP)*Only use one of the methods below if you do not have an email address, or the person you are sending the document to does not have an email address.*☐ Personal hand delivery to:☐ The party☐ The party's family member who is 13 or older, at the party's residence☐ The party's lawyer☐ The party's lawyer's office☐ Mail or third-party carrierc. On: 10/19/2023DateAt: 4:55☐ a.m.☒ p.m.Time



In 3, if you sent the document to more than 1 party or lawyer, fill in a, b, and c. Otherwise leave 2 blank.

3. I sent this document:

a. To:

Name: Robert A. Chapman

First

Middle

Last

Address: 190 S. LaSalle St.#3850 Chicago, Illinois 60603

Street, Apt #

City

State

ZIP

Email address: rchapman@chapmanspingola.com

b. By:

☒ An approved electronic filing service provider (EFSP)

☐ Email (not through an EFSP)

Only use one of the methods below if you do not have an email address, or the person you are sending the document to does not have an email address.

☐ Personal hand delivery to:

☐ The party

☐ The party's family member who is 13 or older, at the party's residence

☐ The party's lawyer

☐ The party's lawyer's office

☐ Mail or third-party carrier

c. On: 10/19/2023

Date

At: 4:55

☐ a.m.

☒ p.m.

Time

Under the Code of Civil Procedure, 735 ILCS 5/1-109, making a statement on this form that you know to be false is perjury, a Class 3 Felony.

If you are completing this form on a computer, sign your name by typing it. If you are completing it by hand, sign by hand and print your name.

I certify that everything in the Proof of Service is true and correct. I understand that making a false statement on this form is perjury and has penalties provided by law under 735 ILCS 5/1-109.

/s/ Alphonse A. Talarico

Your Signature

Alphonse A. Talarico

Print Your Name

6184530

Attorney # (if any)



**ADDITIONAL PROOF OF SERVICE**

In 1a, enter the name, mailing address, and email address of the party or lawyer to whom you sent the document.

1. I sent this document:

a. To:

Name: Christine V. Anto  
*First Middle Last*

Address: 150 N. Michigan Ave. #3300 Chicago Illinois 60601  
*Street, Apt # City State ZIP*

Email address: canto@amundsendavislaw.com

b. By:

☒ An approved electronic filing service provider (EFSP)

☐ Email (not through an EFSP)

*Only use one of the methods below if you do not have an email address, or the person you are sending the document to does not have an email address.*

☐ Personal hand delivery to:

☐ The party

☐ The party's family member who is 13 or older, at the party's residence

☐ The party's lawyer

☐ The party's lawyer's office

☐ Mail or third-party carrier

c. On: 10/19/2023

*Date*

At: 4:50 ☐ a.m. ☒ p.m.  
*Time*

In 1b, check the box to show how you are sending the document.  
**CAUTION:** If you and the person you are sending the document to have an email address, you **must** use one of the first two options. Otherwise, you may use one of the other options.

In c, fill in the date and time that you sent the document.

1-23-1142

FILED  
10/19/2023 8:36 PM  
IRIS Y. MARTINEZ  
CIRCUIT CLERK  
COOK COUNTY, IL  
2022L010905  
24869576

APPEAL TO THE APPELLATE COURT OF ILLINOIS FOR THE FIRST

JUDICIAL DISTRICT No. 1-23-1142

FROM THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

COUNTY DEPARTMENT, LAW DIVISION

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

Plaintiffs-Appellants

vs.

KELLYN. BAUDIN *A/KIA* BAUDIN &  
BAUDIN, BAUDIN & BAUDIN AN  
ASSOCIATION OF ATTORNEYS, LAW  
OFFICES OF BAUDIN & BAUDIN,  
BAUDIN & BAUDIN LAW OFFICES,  
WILLIAM RANDAL BAUDIN *IIA/KI A*  
BAUDIN & BAUDIN, BAUDIN & BAUDIN  
AN ASSOCIATION OF ATTORNEYS, LAW  
OFFICES OF BAUDIN & BAUDIN, BAUDIN  
& BAUDIN LAW OFFICES, KELRAN, INC  
*AI.KIA* 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, *AI.KIA* YALDEN,  
OLSEN & WILLETTE LAW OFFICES, ADR  
SYSTEMS OF AMERICA, LLC., ASSUMED  
NAME ADR COMMERCIAL SERVICES,  
ALLSTATE PROPERTY AND CASULTY  
INSURANCE COMPANY

Defendants-Appellees

CASE NO. 2022L010905



NOTICE OF FILING NOTICE OF APPEAL

**TO: All Attorneys of Record (Please see the attached Service List)**

**PLEASE TAKE NOTICE THAT PLAINTIFFS-APPELLANTS PAUL R.**

**DULBERG AND THE PAUL R. DULBERG REVOCABLE TRUST** in the above-entitled cause, have pursuant to Illinois Supreme Court Rule 301, filed with the Clerk of the Circuit Court of Cook County, Illinois on October 19, 2023 their Notice of Appeal from the orders of the Circuit Court entered in the above-entitled cause. A copy of said Notice of Appeal is herewith served upon you.

October 19, 2023

By: /s/ Alphonse A. Talarico  
ALPHONSE A. TALARICO

Attorney for Plaintiffs-Appellants  
Law Office of Alphonse A. Talarico  
ARDC No. 6184530  
CC 53293  
707 Skokie Boulevard, Suite 600  
Northbrook, Illinois 60062  
(312) 808-1410  
Attorney for Plaintiffs  
contact@lawofficeofalphonsetalarico.com



**PROOF OF SERVICE**

I, the undersigned attorney, certify that this Notice was served to all parties listed on the attached **Service List** by an approved electronic filing service provider (EFSP) on October 19, 2023 at 4:30 p.m. Under penalties as provided by law pursuant to 735 ILCS 5/1-109, I certify that everything set forth in this Proof of Service is true and correct. I understand that making a false statement on this form is perjury and has penalties provided by law under 735 ILCS 5/1-109.

/s/ Alphonse A. Talarico  
Alphonse A. Talarico

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION  
2022L010905

SERVICE LIST

Jason W. Jochum  
George J. Manos  
LEWIS BRISBOIS BISGAARD & SMITH LLP  
550 West Adams Street, Suite 300  
Chicago, Illinois 60661  
P: (312) 345-1718/F: (312) 345-1778  
Jason.Jochum@lewisbrisbois.com  
George.Manos@lewisbrisbois.com  
Zachary.McGourty@lewisbrisbois.com

Robert A. Chapman  
CHAPMAN SPINGOLA, LLP  
190 South LaSalle Street, Suite 3850  
Chicago, Illinois 60603  
P:(312) 630-9202  
F:(312) 630-9233  
rchapman@chapmanspingola.com  
wdickmann@chapmanspingola.com

Christine V. Anto  
Amundsen Davis, LLC  
150 North Michigan Avenue, Suite 3300  
Chicago, Illinois 60601  
P: (312) 894-3200  
canto@amundsendavislaw.com

mtinajero@amundsendavislaw.com  
JSchuth@amundsendavislaw.com

Jeremy N. Boeder  
Tribler Orpett & Meyer, P.C.  
225 W. Washington Street, Suite 2550  
Chicago, Illinois 60606  
jnboeder@tribler.com  
docket@tribler.com