

**Date : 1/23/2021 3:06:44 PM**

**From : "Paul Dulberg"**

**To : "Alphonse Talarico"**

**BCc : "Paul Dulberg"**

**Subject : Why second amended complaint needed to be written**

**Attachment : second\_amended\_complaint.txt;**

Dear Mr Talerico,

You asked why a Second Amended Complaint was filed.

17LA000377--2018-09-19--REOP\_0030.pdf (not attached due to our call. You already read this) is the transcript of the hearing where the judge struck down the first amended complaint and gives his reasons.

The judge allowed for a re-pleading by October 10th

On October 3rd 2018 I sent Mr Gooch my issues with his draft of the second amended complaint.

The draft of the second amended complaint I was given to read did not address the concerns the Judge had with the first amended complaint nor did it address the case within a case issues raised.

I have attached a file named "second\_amended\_complaint.txt" which was sent to Mr Gooch on October 3, 2018

Mr Gooch was offended by the second\_amended\_complaint.txt I had sent him.

Mr Gooch then started accusing me of things I simply did not do and had no bearing on the case.

I tried to get clarification and Mr Gooch doubled down on me with unfounded accusations and threatened to withdraw.

The relationship was devolving and I knew I needed to find new counsel fast.

I hired the Clinton Firm and their first order of business was to rewrite the complaint so that it addressed all of the concerns the Judge had with the first amended complaint and address the case within a case issue

Thanks,  
Paul