

**Date : 1/30/2021 11:29:33 AM**

**From : "Alphonse Talarico"**

**To : "Paul Dulberg"**

**Subject : Report of proceedings May 10 2018 filed January 25 2021**

**Attachment : Recorded proceedings May 10, 2018 filed by defendants January 25 2021 CC-Civil - 17LA000377 - 1\_25\_2021 - - - REOP - -.pdf;**

Dear Mr. Dulberg,

This recent filing by Defendants brings to light another factor I did not know.

First, although the order from the date drafter by the Gooch firm correctly states that the 2-619 motion was denied, it does not indicate the road map the judge laid out to bring the 2-619 motion again and that a motion for summary judgment might be appropriate at a later date.

Furthermore, the question of estoppel was left open also.

The order should have indicated such by saying denied without prejudice...

I have attached the report of proceedings for your comment.

This with the Clinton's firm failure to respond (and maybe an improper prior response) to Defendants' affirmative defenses paints an interesting picture of your case.

Sincerely,

Alphonse A. Talarico Esq.