

Date : 6/25/2021 11:05:27 AM
From : "Alphonse Talarico"
To : "Paul Dulberg"
Subject : Re: 17LA377 Barch Documents subpoena

Rule 216. Admission of Fact or of Genuineness of Documents

Alphonse A. Talarico

From: Paul Dulberg <Paul_Dulberg@comcast.net>

Sent: Friday, June 25, 2021 8:28 AM

To: Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>

Subject: Re: 17LA377 Barch Documents subpoena

Dear Mr Talarico,

What is it called that you described yesterday about giving the defense 28 days to respond with admittance or denial of altering documents?

Sorry, I forgot to write down what you called it so I could look it up.

On a side note, I have to take my blind mother in for the COVID vaccine today.

My apologies in advance if you call and I am not available on the phone while she is getting vaccinated.

Thanks,

Paul

On Jun 24, 2021, at 1:24 PM, Paul Dulberg <Paul_Dulberg@comcast.net> wrote:

Dear Mr Talarico,

On March 18, 2013 Popovich Firm sent medical billing receipts to Ronald Barch

This has the altered RX receipts

McGuire's were deposed on March 20, 2013 only 2 days after the altered receipts appear in the record.

Where?

Open Clinton file:

Find Folder named:

Dulberg Cicero France Barch Production Complete

Find File named:

Plaintiff's Discovery Responses.pdf

Page 98 through 103

Pages 102 and 103 show the altered RX receipts with the timestamps removed

I have attached the file "Plaintiff's Discovery Responses.pdf" sent from Barch to Clinton in response to the document subpoena just in case you cannot find it in the Clinton file.

I have also attached "Dulberg - Subpoena mailed to Cicero et al October 24, 2019.pdf" which is also from the Clinton file.

Thanks,

Paul

<Plaintiff's Discovery Responses.pdf>

<Dulberg - Subpoena mailed to Cicero et al October 24, 2019.pdf>

On Jun 24, 2021, at 12:21 PM, Paul Dulberg
<Paul_Dulberg@comcast.net> wrote:

Dear Mr Talarico,

Please find the attached file named "Nurses Report-Centegra.pdf"

On Page 2 of "Nurses Report-Centegra.pdf" or Dulberg 000227 circled in hand written notes is the time of 17:13 or 5:13 pm

Again on page 4 or Dulberg 000229 where it says "Discharged by:" the time is also written as 17:13 or 5:13PM

Facts Show:

5:13 pm is the last recorded time Dulberg is at the hospital

5:39 pm Dulberg checks in at the pharmacy and is waiting for the prescription to be filled

What happened in-the 26 minutes between 5:13 pm and 5:39 pm?

Dulberg was helped to get in the passenger side of his truck in the hospital parking lot,

(this took a few minutes as Dulberg was unable to climb up in the truck on his own)

Dulberg was then driven from the hospital to the nearest pharmacy by Gagnon.

Dulberg took a moment and sat outside the pharmacy and smoked a cigarette before entering the pharmacy because it was quite the ordeal he had just been through.

What didn't happen in-the 26 minutes between 5:13 pm and 5:39 pm?

Dulberg did not drive from the hospital through the city of McHenry, through the Village of Johnsburg, into Mchenry Township to Caroline McGuire's home.

Caroline McGuire did not give Dulberg \$50.00 for the prescriptions (without stopping at a pharmacy to get a price, how would Caroline McGuire know \$50.00 would pay for the prescriptions?)

Dulberg did not Drive from Caroline McGuire's home in McHenry Township, through the Village of Johnsburg, through the city of

McHenry, past 3 other pharmacies to end up at the closest pharmacy to the hospital.

I hope this puts things in perspective.

I'm glad to answer any questions and have started looking for the Barch subpoena and Barch's response within the Clinton file.

Thanks,

Paul

<Nurses Report-Centegra.pdf>

On Jun 24, 2021, at 10:59 AM, Paul Dulberg
<Paul_Dulberg@comcast.net> wrote:

From the previous email

Typo:

Pages 7 and 8 of "RX Timestamps.pdf" is POP 000726 and POP 000727 showing the original unaltered receipt for Hydrocodone.

Should read:

Pages 7 and 8 of "RX Timestamps.pdf" is POP 000726 and POP 000727 showing the original unaltered receipt for Cefadroxil.

On Jun 24, 2021, at 10:55 AM, Paul Dulberg
<Paul_Dulberg@comcast.net> wrote:

Pages 7 and 8 of "RX Timestamps.pdf" is POP 000726 and POP 000727 showing the original unaltered receipt for Hydrocodone.