

**Date : 12/6/2022 3:42:05 PM**  
**From : "Paul Dulberg"**  
**To : "Law Office Of Alphonse Talarico"**  
**BCc : "Paul Dulberg"**  
**Subject : Re: Lets talk about using these**

Last text found on ADR before September/October Affidavits and motions for Bankruptcy still shows I haven't agreed.

• On August 16, 2016 at 7:42 AM Plaintiff Dulberg sent a text message to Defendant W. Randall Baudin II stating: "Randy, I have to ask again, why is it wise to agree to mediate before permanent disability is determined by social security since the permanent disability rating would be a large factor in determining what the insurance adjuster is willing to give? Both mom and myself need a real answer to this question"

Or put this way, your choice:

"Randy, I have to ask again, why is it wise to agree to mediate ...? Both mom and myself need a real answer to this question"

> On Dec 6, 2022, at 2:59 PM, Paul Dulberg <Paul\_Dulberg@comcast.net> wrote:

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> • On July 19, 2016 at 7:56 AM Defendant W. Randall Baudin II sent a text message to Plaintiff Dulberg stating:

> "...We again urge you to do the binding mediation."

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> • On July 19, 2016 at 8:47 AM Plaintiff Dulberg sent a text message to Defendant W. Randall Baudin II stating:

> "... tell Kelly to ask that Allstate wait till possibly Thursday for their answer. ..."

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> • On July 19, 2016 at 10:07 AM Defendant W. Randall Baudin II sent a text message to Plaintiff Dulberg stating:

> "... We as your lawyers say that it is the best that you do the binding mediation. We are deciding this based on facts and odds as to give you the best outcome. ..."

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> • On July 19, 2016 at 1:46 PM Plaintiff Dulberg sent a text message to Defendant W. Randall Baudin II stating:

> "... I'll spend money and roll the dice. ..."

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> • On July 19, 2016 at 4:28 PM Defendant W. Randall Baudin II sent a text message to Plaintiff Dulberg stating:

> "So sorry your texts come in out of order. Binding mediation or no."

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> • On July 20, 2016 at 11:44 AM Defendant W. Randall Baudin II sent a text message to Plaintiff Dulberg stating:

> "... Kelly called and we have Cole show Sean in the next hour or so. Kelly had promised her we were calling yesterday, they have to know what's going on and make arrangements regarding additional counsel. Again, as your attorneys we are strongly urging you to participate in the binding mediation. It is your best opportunity for the greatest possible recovery and the guarantee that you would at least walk away with something if you got 0. Again, this gives us the most control of the situation."

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> • On July 20, 2016 at 1:04 PM Defendant W. Randall Baudin II sent a text message to Plaintiff Dulberg stating:

> "Yes binding mediation?"

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> • On July 20, 2016 at 1:24 PM Plaintiff Dulberg sent a text message to Defendant W. Randall Baudin II stating:

> "... I will be moving forward with litigation at this time. ... I just cannot give up the protections of a public trial with the possibility of review should something be handled wrongly in the hopes of saving a few thousand dollars and time. ..."

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