

Date : 6/7/2023 3:19:11 PM

From : "Alphonse Talarico"

To : "Paul Dulberg" , "Paul Dulberg" , "T Kost"

Subject : Response to Baudins 735 ILCS 5/2-619.1 Motion to Dismiss 2022L010905

Attachment : Email attachmernt from Client Dulberg regardingIf Illinois determined the disability or social security favicon.ico sent by client makes no sense; favicon.ico sent by client makes no sense; Affidavit of Dulberg Exhibits I, II, III .docx; Illinois Statute on Other Disability.docx; Dulberg Disabled Illinois Secretary of State.pdf; Dulberg's Response to Baudin's 735 ILCS 52-619.1 Motion to Dismiss (1).docx; Miscellaneous Special Fraud ilcs4.pdf; Dr Kujawa response letter to kelly Baudin in 2016.pdf;

Gentle men,

Please clarify What Documents should be included, and how they are to be incorporated.

Please be as accurate as possible so that I can file and serve the Response as soon as possible.

the Documents I must file and serve are as follows:

-Notice of Filing

-Response

-Mr. Dulberg's affidavit establishing facts that are not yet part of the record which i believe should be as follows:

-Exhibit I Mr. Dulberg's Illinois Identification Card

-Exhibit II The previously submitted (and declared to be insufficient by itself) April 20, 2017 Notice of Decision- Fully favorable from the Social Security Administration

-Exhibit III the April 4, 2016 Response from Doctor Kujawa to Ms. Kelly Baudin

-Proposed Order in pdf and word

Additionally, I suggested citing the relevant portion (only) of 735 ILCS 5/13(e) and (f) but a counter-suggestion was made to include the entire statute so I need instruction.

I have attached all the unfinished documents as they are currently formed so a complete set of instructions can be made.

Finally, I do not comprehend " I instructed to add "R2.45 Plaintiff Paul R. Dulberg is also classified by the Illinois Secretary of State to have

a class P2A disability as a result of the injuries that occurred on June 28, 2011. A class P2A disability is defined as follows:" to the ANSWER TO THE BAUDIN SUMMARY JUDGEMENT

Once I have the clarifications and instructions I seek, i will finalize the documents, seek leave to file late and file and serve.

Your anticipated cooperation is greatly appreciated,

Alphonse A. Talarico Esq.