

**Date :** 8/23/2023 1:39:59 PM

**From :** "Alphonse Talarico"

**To :** "Paul Dulberg"

**Cc :** "Tom Kost"

**Subject :** Re: Response to Allstate's Motion for Summary Judgment and Sur-Reply to Baudins' Reply

Please do not use ARDC Complaint information as an evidentiary exhibit because the facts that the statements are contained in an ARDC Complaint violates confidentiality and leads to liability or worse.

May I see the drat response as it exists so far.

**From:** Paul Dulberg <pdulberg@icloud.com>

**Sent:** Tuesday, August 22, 2023 8:27 AM

**To:** Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>

**Cc:** Tom Kost <tkost999@gmail.com>

**Subject:** Re: Response to Allstate's Motion for Summary Judgment and Sur-Reply to Baudins' Reply

If you need me to reword the confusing sentence let me know how to say it better.

I am a rookie and would also like to know how to properly use the ARDC Complaint as evidence, if I did it wrong please advise so we can fix it.

We are currently drafting the response to Allstates motion, this too will use ARDC complaints as exhibits.

Paul

On Aug 22, 2023, at 8:21 AM, Alphonse Talarico  
<contact@lawofficeofalphonsetalarico.com> wrote:

Gentlemen,

My confusion was exacerbated by the sentence "

If your good with it we can send it out."

As I previously stated I want to be sure how a ARDC Complaint should be used as evidence.

Today, I will review the Sur-reply and next draft the Motion and Notice of Motion the Sur-Reply should be attached to.

My recollection is that you will be thinking/drafting about our Response to Allstates Motion for Summary Judgment due August 24, 2023.

Thank you,

Alphonse A. Talarico

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**From:** Paul Dulberg <[pdulberg@icloud.com](mailto:pdulberg@icloud.com)>

**Sent:** Tuesday, August 22, 2023 7:55 AM

**To:** Alphonse Talarico <[contact@lawofficeofalphonsetalarico.com](mailto:contact@lawofficeofalphonsetalarico.com)>

**Cc:** Tom Kost <[tkost999@gmail.com](mailto:tkost999@gmail.com)>

**Subject:** Re: Response to Allstate's Motion for Summary Judgment and Sur-Reply to Baudins' Reply

We are using the Popovich ardc complaint as one of the exhibits in the Baudin Sur reply

On Aug 22, 2023, at 6:11 AM, Alphonse Talarico  
<[contact@lawofficeofalphonsetalarico.com](mailto:contact@lawofficeofalphonsetalarico.com)> wrote:

Gentlemen,

Our Response to Allstate's Motion for summary Judgment is due on August 24, 2023.

I am confused regarding the last email from Mr. Dulberg which appears to refer to the ARDC Complaint against Popovich and Mast, but contains attachments regarding the Baudin sur-reply.

Please clarify.

Thank you,

Alphonse A. Talarico

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