

From: Paul Dulberg Paul_Dulberg@comcast.net
Subject: Fwd: Baudin Text messages corrected from recovered iPad files.
Date: December 6, 2022 at 11:30 AM
To: Alphonse Talarico contact@lawofficeofalphonsetalarico.com
Bcc: Paul Dulberg Paul_Dulberg@comcast.net

PD

Begin forwarded message:

From: Paul Dulberg <Paul_Dulberg@comcast.net>
Subject: Baudin Text messages corrected from recovered iPad files.
Date: October 17, 2022 at 6:27:31 AM CDT
To: Alphonse Talarico <contact@lawofficeofalphonsetalarico.com>

Dear Mr Talarico.

Below I fixed the issue where I inadvertently placed the breaking lines between texts in the wrong location back when I memorialized the Baudin text messages on the Old iPad that is now recovered.

I did change the format of the timestamps so each message starts and ends with the date, etc.
This made it easier to add the line breaks between text messages and add these to a timeline in the future.

If there are any obvious mistakes its my fault.
Please let me know if you find any mistakes and I will correct it.

We need to discuss a plan on how and when it is appropriate to supplement our document disclosure with all the recovered files and the documents Julia Williams inexplicably did not disclose.
I have a feeling this will be a major undertaking just to identify what Julia didn't disclose and expect Flynn to act upset.

Thanks,
Paul

Special Notes:

— Individual text messages are separated by a single horizontal line of dashes.

Example:

— Dates are separated by two horizontal lines of dashes.

Example:

— Texts start approximately 4.5 months before Baudin files appearance on November 3, 2015.

— Texts end approximately 10 or 11 months after the case was closed and when Gooch filed his original complaint.

— 3rd text shows Baudin reached out to and discussed the case with defense counsel before Baudin and Dulberg had a contract or retainer agreement.

— These originated from the dead iPad that is now recovered and have not been turned over to opposing counsel and do not have bates numbers.

START

2015-06-17 - Baudin text to Dulberg:

Paul, Randy 2. You around

(815) 307-6197 3:28:19 PM June 17, 2015

2015-06-17 - Dulberg text to Baudin:

Yes

(847) 497-4250 3:52:54 PM June 17, 2015

2015-06-17 - Baudin text to Dulberg:

I'm still talking to Kelly about it but I did speak with the defense lawyer. Maybe I can trying call you tomorrow to discuss

(815) 307-6197 2015-06-17 4:10:24 PM June 17, 2015

2015-06-17 - Dulberg text to Baudin:

Ok

(847) 497-4250 4:18:39 PM June 17, 2015

2015-06-18 - Dulberg text to Baudin:

Still going to call today?

(847) 497-4250 3:16:36 PM June 18, 2015

2015-06-18 - Baudin text to Dulberg:

Probably tomorrow sorry. But thinking about taking it assuming attorney liens not too great

(815) 307-6197 3:25:52 PM June 18, 2015

2015-06-19 - Dulberg text to Baudin:

Perhaps Monday?

(847) 497-4250 4:32:24 PM June 19, 2015

2015-06-24 - Dulberg text to Baudin:

Hi Randy, it's Paul the guy with the chainsaw injury.

Didn't hear back from you last week so I Just wanted to keep in touch and see how things are going

(847) 497-4250 12:30:55 PM June 24, 2015

2015-06-24 - Baudin text to Dulberg:

Sorry, out of town till tomorrow afternoon

(815) 307-6197 1:07:14 PM June 24, 2015

2015-06-30 - Dulberg text to Baudin:

Morning Randy,
I have to appear on July 10 at 9 am in front of Judge Meyer.
I was told if I appear alone I have to file something I think the judge called notice of appearance with the defense in writing and that I
can get more time to find representation but I'm not even sure what it is or who to send it to.
Yes, I'm nervous
Paul
847-497-4250

(847) 497-4250 8:44:19 AM June 30, 2015

2015-06-30 - Baudin text to Dulberg:

Text me a little later today. I'll talk to Kelly again.

(815) 307-6197 8:45:07 AM June 30, 2015

2015-06-30 - Dulberg text to Baudin:

It's a little later

(847) 497-4250 11:40:59 AM June 30, 2015

2015-06-30 - Dulberg text to Baudin:

Is Kelly your partner?

(847) 497-4250 11:42:58 AM June 30, 2015

2015-06-30 - Baudin text to Dulberg:

Wife and lawyer yep.

(815) 307-6197 12:02:12 PM June 30, 2015

2015-07-01 - Dulberg text to Baudin:

Morning,
Did you talk with Kelly?

(847) 497-4250 18:32:52 AM July 1, 2015

2015-07-02 - Dulberg text to Baudin:

Morning Randy, sorry I couldn't see any texts yesterday, my comcast phone text was down.
Any progress?

(847) 497-4250 9:32:07 AM July 2, 2015

2015-07-06 - Dulberg text to Baudin:

Morning Randy,
Hope you had a good 4th of July Holiday.
Please give me a call
Thanks in advance
~

Paul
Paul Dulberg
847-497-4250

(847) 497-4250 8:36:13 AM July 6, 2015

2015-07-06 - Dulberg text to Baudin:

You asked for a reminder this afternoon
I'm available
Thanks,
Paul
847-497-4250

(847) 497-4250 1:10:49 PM July 6, 2015

2015-07-06 - Dulberg text to Baudin:

Hi Randy,
Here is the reminder you requested.
Please call me
Thanks again,
Paul
Paul Dulberg
847-497-4250

(847) 497-4250 2:04:30 PM July 6, 2015

2015-07-06 - Baudin text to Dulberg:

Why still at the dentist sorry...

(815) 307-6197 2:47:05 PM July 6, 2015

2015-07-06 - Dulberg text to Baudin:

Hope it's just a cleaning, anything else usually hurts

(847) 497-4250 2:47:48 PM July 6, 2015

2015-07-06 - Baudin text to Dulberg:

I think minor stuff thanks for asking

(815) 307-6197 2:53:07 PM July 6, 2015

2015-07-06 - Dulberg text to Baudin:

If today isn't good, I'll take tomorrow
Hope the minor stuff is painless

(847) 497-4250 3:51:58 PM July 6, 2015

2015-07-07 - Dulberg text to Baudin:

Morning Randy,
Hope your mouth is feeling better

hope your mouth is feeling better.
Think we can discuss my case today?
Thanks,
Paul
847-497-4250

(847) 497-4250 9:18:36 AM July 7, 2015

2015-07-07 - Dulberg text to Baudin:

Hi Randy,
I'm starting to feel like a pest but I do need your help.
Please give me something, my court date is this Friday at 9 am.
Thanks in advance for your advice and any help,
Paul

(847) 497-4250 10:21:58 AM July 7, 2015

2015-07-07 - Baudin text to Dulberg:

Hi. I was in court this morning. Kelly was wondering, do you have your file or not right

(815) 307-6197 11:05:36 AM July 7, 2015

2015-07-07 - Dulberg text to Baudin:

Funny you ask, I just asked my former attorney yesterday what it's going to cost to get the file and he replied \$0. This morning I asked them when and where I could pick up the file and I'm awaiting a reply

(847) 497-4250 11:07:55 AM July 7, 2015

2015-07-07 - Baudin text to Dulberg:

Ask for a release of lien as well

(815) 307-6197 11:09:32 AM July 7, 2015

2015-07-07 - Baudin text to Dulberg:

Need one from Hans to

(815) 307-6197 11:09:43 AM July 7, 2015

2015-07-07 - Dulberg text to Baudin:

Ok

(847) 497-4250 11:11:22 AM July 7, 2015

2015-07-07 - Dulberg text to Baudin:

I know both said they are willing to work with my new council

(847) 497-4250 2015-07-07 11:12:06 AM July 7, 2015

2015-07-07 - Baudin text to Dulberg:

2015-07-07 - Baudin text to Dulberg:

I think any lawyers gonna want to know what they're looking for before they take it. Because the risk is very great, especially if those people have a lien.

(815) 307-6197 11:13:19 AM July 7, 2015

2015-07-07 - Dulberg text to Baudin:

Both also know if they don't help you they get nothing

(847) 497-4250 11:14:04 AM July 7, 2015

2015-07-07 - Dulberg text to Baudin:

Can I buy them out of the lean?

(847) 497-4250 11:26:57 AM July 7, 2015

2015-07-07 - Baudin text to Dulberg:

Yeah, but you got to make sure that money from med pay you got to say for us for costs and stuff

(815) 307-6197 11:27:22 AM July 7, 2015

2015-07-07 - Dulberg text to Baudin:

My mom is offering to buy them out of the lean if that's what it takes

(847) 497-4250 11:28:50 AM July 7, 2015

2015-07-07 - Baudin text to Dulberg:

Ok

(815) 307-6197 11:30:32 AM July 7, 2015

2015-07-07 - Dulberg text to Baudin:

Hans Mast is out till the 15th but his secretary Sheila is going to get my message to him. I'm still waiting for Brad Balky to reply

(847) 497-4250 11:53:47 AM July 7, 2015

2015-07-07 - Baudin text to Dulberg:

Ok

(815) 307-6197 11:54:02 AM July 7, 2015

2015-07-07 - Dulberg text to Baudin:

Both attorneys have been informed of an offer for the release of lean and that I need to know before Friday or they stand to get nothing

(847) 497-4250 12:21:30 PM July 7, 2015

2015-07-08 - Dulberg text to Baudin:

Morning Randy,

Hans Mast replied,
"just make me a reasonable offer, we are happy to work with you."

I haven't heard from Brad Balke and probably won't till tomorrow. He is out of the office till Thursday.

(847) 497-4250 9:31:00 AM July 8, 2015

2015-07-08 - Baudin text to Dulberg:

Which means

(815) 307-6197 9:32:40 AM July 8, 2015

2015-07-08 - Dulberg text to Baudin:

I believe it means Hans is willing to release his lean but I'm not sure what amount is reasonable

(847) 497-4250 9:38:13 AM July 8, 2015

2015-07-08 - Baudin text to Dulberg:

How much stuff did he do

(815) 307-6197 9:39:00 AM July 8, 2015

2015-07-08 - Dulberg text to Baudin:

He did the depositions and filed the necessary court papers up until the pretrial settlement hearing.

(847) 497-4250 9:40:35 AM July 8, 2015

2015-07-08 - Baudin text to Dulberg:

Might ask him what he's looking for

(815) 307-6197 9:41:38 AM July 8, 2015

2015-07-08 - Dulberg text to Baudin:

Ok

(847) 497-4250 9:41:51 AM July 8, 2015

2015-07-08 - Dulberg text to Baudin:

Hans response,
If your calculating our time it'd be a lot. But just give me what you can do.

(847) 497-4250 11:44:19 AM July 8, 2015

2015-07-08 - Dulberg text to Baudin:

I think he had at least 7 depositions

(847) 497-4250 11:55:18 AM July 8, 2015

2015-07-08 - Dulberg text to Baudin:

Hans said 5,000

(847) 497-4250 2:08:57 PM July 8, 2015

2015-07-09 - Dulberg text to Baudin:

Ok, finally chatted with Brad Balke...

He paid \$1539.32 to Hans Mast for expenses

Another \$1539.32 is still owed to Hans

Brad said that Hans signed off the lean and is not entitled to anything else.

Brad is going to consult with some legal ethics person today because he has never sold a lean back to a client and wants to make sure there wouldn't be any problems

(847) 497-4250 9:31:43 AM July 9, 2015

2015-07-09 - Dulberg text to Baudin:

Any advice would be appreciated

(847) 497-4250 10:10:51 AM July 9, 2015

2015-07-09 - Dulberg text to Baudin:

Yesterday Hans wanted \$5k, today I'm told Hans isn't entitled to anything other than \$1539.32 because he signed off on the lean.

Brad is looking into something about ethics as to why I may not be able to buy the lean.

Am I being fed a line of crock by these guys?

(847) 497-4250 11:24:12 AM July 9, 2015

2015-07-09 - Dulberg text to Baudin:

Randy, this just keeps getting more crazy...

Hans admits he signed off on the lease and that Brad paid the expenses.

Brad said I still owe Hans roughly \$1500 more.

I don't believe either of them any more

(847) 497-4250 2:12:58 PM July 9, 2015

2015-07-09 - Dulberg text to Baudin:

Hans won't disclose to me what amount brad did pay till next Thursday and I'm due in court tomorrow

(847) 497-4250 2015-07-09 2:15:34 PM July 9, 2015

2015-07-09 - Baudin text to Dulberg:

Tell the judge are still trying to work on the liens and you're speaking with our office to possibly take the case

(815) 307-6197 2:16:09 PM July 9, 2015

2015-07-09 - Dulberg text to Baudin:

Ok... But I think I may need to file some sort of notice of appearance by 5pm with the clerk and send a copy to Allstate to continue this. All I need is who and where to send it to

(847) 497-4250 2:19:34 PM July 9, 2015

2015-07-10 - Dulberg text to Baudin:

Morning Randy,
Brad Balke has signed a release of lean and has been paid for all expenses on this case. He Promises to get me both the electronic and regular file on this case early next week.
Judge Meyer has set the next court date for September 8, 2015 at 9am for Trial Setting and something called Scheduling of FC's cut offs.
Paul

(847) 497-4250 10:31:36 AM July 10, 2015

2015-07-17 - Dulberg text to Baudin:

Morning Randy,
It's the chainsaw injury guy again.
I picked up a box of papers that is the case file from Brad Balke.
Both Brad Balke and Hans Mast before him spoke of an electronic file but now apparently there isn't one.
Either way, the attorney leans have been removed.
I'd like to move forward with you if you are willing?
Paul
847-497-4250

(847) 497-4250 8:40:26 AM July 17, 2015

2015-07-17 - Dulberg text to Baudin:

I can bring in the box of papers if you wish to look them over

(847) 497-4250 9:05:11 AM July 17, 2015

2015-07-17 - Dulberg text to Baudin:

Can we set up a time to look this over?
Sorry if I'm a pest... I just feel like a fish out of his environment and I need help

(847) 497-4250 12:08:27 PM July 17, 2015

2015-07-17 - Baudin text to Dulberg:

No pest call day afternoon

(815) 307-6197 12:58:42 PM July 17, 2015

2015-07-17 - Dulberg text to Baudin:

Is around 2 pm ok?

(847) 497-4250 1:00:13 PM July 17, 2015

2015-07-20 - Dulberg text to Baudin:

Is this afternoon a good time to call?

(847) 497-4250 12:54:35 PM July 20, 2015

2015-07-21 - Dulberg text to Baudin:

Hi Randy,

Just spoke with someone from your office.

I Will have the file to your place by the end of the week.

Just have to say, I've been reading this stuff, don't understand the medical stuff but the defendants depositions are quite comical.

Can't believe I'm described as an unemployed homosexual who cut myself on his chainsaw and offered him money for his favorable testimony and that I'm faking my injuries...

LoL., it's a must read.

The guy lied about everything other than the date, he even lied about whether or not he has a kid.

I'm sure you and Kelly are going to get a kick out of this when you read it.

Lol, I know I am

(847) 497-4250 12:39:08 PM July 21, 2015

2015-07-24 - Dulberg text to Baudin:

Hi Randy,

Got the file dropped off at your office today.

Paul

(847) 497-4250 3:10:52 PM July 24, 2015

2015-07-24 - Dulberg text to Baudin:

Darn it... I still have the check.

Can get it to you next week

Have a good weekend

(847) 497-4250 3:15:25 PM July 24, 2015

2015-07-24 - Baudin text to Dulberg:

Ok

(815) 307-6197 3:30:05 PM July 24, 2015

2015-07-27 - Dulberg text to Baudin:

Morning Randy,

Let's get together sit and talk after you two read through the case file.

Thanks,

Paul

(847) 497-4250 8:08:21 AM July 27, 2015

2015-07-24 - Baudin text to Dulberg:

True. A lot of material.

(815) 307-6197 8:10:15 AM July 27, 2015

2015-07-27 - Dulberg text to Baudin:

There are 5 depositions and only cliff notes on the dr's. I know the dr deps have been done but I didn't get a copy of them with the file.

Do I need to track them down and get you the copies?

(847) 497-4250 8:15:58 AM July 27, 2015

2015-08-03 - Dulberg text to Baudin:

Hi Randy,

Hope your weekend was good.

It's only been a week since I've dropped off the file. I made copies and its Taken me a week just to sort it all out.

I've finally been able to read through the deps in detail.

Please feel free to call or text any questions.

Thanks,

Paul

(847) 497-4250 10:58:42 AM August 3, 2015

2015-08-10 - Dulberg text to Baudin:

Hi Randy,

Just want to stay in touch, let me know when you and your wife have had a chance to read the file and want to talk.

Thanks in advance,

Paul

(847) 497-4250 12:40:25 PM August 10, 2015

2015-08-17 - Dulberg text to Baudin:

Hi Randy,

Just want to stay in touch. Each week that passes makes me more nervous.

Thanks,

Paul

(847) 497-4250 9:52:38 AM August 17, 2015

2015-08-24 - Dulberg text to Baudin:

Morning Randy,

Hope you had a chance to review the case file.

I only have 2 weeks till I'm due in front of Judge Meyer and would like to meet with you and your wife to discuss it this week.

Please let me know.

Thanks,

Paul

(847) 497-4250 7:51:20 AM August 24, 2015

2015-08-26 - Dulberg text to Baudin:

Hi Randy,
Spoke with what I think is a perfect expert witness. He specializes in both the type of tree and chainsaws. Here is his link.
<http://www.experts.com/Expert-Witnesses/Forestry-Expert-Witness-Bobby-Lanford>

Also picked up a certified copy of the defendants paternity settlement at the county clerks office. Still not clear why he lied about having a child but lying seems to be a pattern with this guy.

Also, contacted the Genoa city chamber of commerce to see if his auto body business is legitimate. Haven't heard back from them but I can't seem to find his business listed in either Illinois or Wisconsin. He's also not listed with the EPA which regulates that industry.

I have sent a request out to USGS, NOAA and SatCom to see if any aerial or satellite images were taken that day. I want to see if it shows my truck there in the morning also to see if it shows the fire in the garden from burning the branches.

Please get back to me soon.
Thanks,
Paul
847-497-4250

(847) 497-4250 11:29:52 AM August 26, 2015

2015-08-28 - Dulberg text to Baudin:

Randy, please call me.
Thanks,
Paul
847-497-4250

(847) 497-4250 11:05:35 AM August 28, 2015

2015-08-28 - Dulberg text to Baudin:

Silly ?
I have finally found the recording company that took the dr's depositions. It's vahl reporting. The defendants attorneys ordered the depositions be taken. Vahl wants \$723.50 for the transcripts and said that no one has ordered copies yet.
Can I file with the court under I think it's SC rule 213 and make the defendant pay for the copies and provide them to me or am I still on the hook for the money for the copies?
Thank you in advance and please give me a call soon.
Paul

(847) 497-4250 12:41:32 PM August 28, 2015

2015-09-02 - Dulberg text to Baudin:

Hi Randy,
Thanks for looking over my case file.
Please let me know if your willing to represent me.
If not please let me know when I can pick up the case file.
Once again, thanks for your consultation and consideration and sorry if I waisted your time.
Paul
847-497-4250"

(847)-497-4250 1:57:51 PM September 2, 2015

2015-09-08 - Dulbera text to Baudin:

Thank you for this morning.
Let's get together and talk

(847)-497-4250 10:58:00 AM September 8, 2015

2015-09-08 - Baudin text to Dulberg:

No problem sir yeah Kelly started going through the stuff but it's a lot of it

(815) 307-6197 10:58:51 AM September 8, 2015

2015-09-08 - Dulberg text to Baudin:

If she needs help please have her call me

(847)-497-4250 11:00:15 AM September 8, 2015

2015-09-08 - Baudin text to Dulberg:

Can't remember, did you say that you still have that med paycheck or you had to pay your mom back

(815) 307-6197 11:00:59 AM September 8, 2015

2015-09-08 - Dulberg text to Baudin:

I had it at court this morning. I have it

(847)-497-4250 11:15:50 AM September 8, 2015

2015-09-08 - Baudin text to Dulberg:

Who is That one made out to?

(815) 307-6197 11:16:16 AM September 8, 2015

2015-09-08 - Dulberg text to Baudin:

Me but I can sign it over

(847)-497-4250 11:16:50 AM September 8, 2015

2015-09-08 - Baudin text to Dulberg:

Yeah let me talk to Kelly.

(815) 307-6197 11:17:02 AM September 8, 2015

2015-09-08 - Baudin text to Dulberg:

The 5000 would be a non-refundable retainer to review all the records and prepare for additional pretrial. Hopefully we would able to get the case settl

(815) 307-6197 3:08:00 PM September 8, 2015

2015-09-08 - Baudin text to Dulberg:

ed in another pretrial or perhaps a binding arbitration or mediation. We will have you execute a fee agreement reflecting the above.
I'm also hopeful t

(815) 307-6197 3:08:01 PM September 8, 2015

2015-09-08 - Baudin text to Dulberg:

hat we are able to get any and all liens reduced as to maximize your recovery. Additionally, I believe you said your mother will be
willing to extend an

(815) 307-6197 3:08:02 PM September 8, 2015

2015-09-08 - Baudin text to Dulberg:

y monies needed for costs, depositions or transcripts. Let me know if agreeable to you.

(815) 307-6197 3:08:03 PM September 8, 2015

2015-09-08 - Dulberg text to Baudin:

Popovich law firm removed 1/3 of the 5000 med payment.
My mom would need to see the final agreements. It's her money and she is willing to help but after our experience with Popovich
and Balke she's on the fence when it comes to lawyers.
Also would like to sit down and discuss in detail prior to signing.

(847)-497-4250 5:14:55 PM September 8, 2015

2015-09-08 - Baudin text to Dulberg:

Yeah I guess so we can set another meeting let's try and regroup and figure out and try to work on a plan that works for everybody

(815) 307-6197 5:16:02 PM September 8, 2015

2015-09-08 - Dulberg text to Baudin:

Agreed, when?

(847)-497-4250 5:19:01 PM September 8, 2015

2015-09-08 - Baudin text to Dulberg:

Connect via text tomorrow and work on it

(815) 307-6197 5:20:55 PM September 8, 2015

2015-09-08 - Dulberg text to Baudin:

Ok

(847)-497-4250 5:22:29 PM September 8, 2015

2015-09-09 - Dulberg text to Baudin:

As far as I know we are available any day other than the 16th or 17th or the morning of the 23rd.

(847)-497-4250 10:29:51 AM September 9, 2015

2015-09-09 - Baudin text to Dulberg:

Thanks. I'm still in court. I'll try to connect with Kelly when I am back

(815) 307-6197 10:31:25 AM September 9, 2015

2015-09-09 - Dulberg text to Baudin:

We can brief you on the file.

(847)-497-4250 4:09:30 PM September 9, 2015

2015-09-10 - Dulberg text to Baudin:

Have you come up with a date yet?

(847)-497-4250 12:37:36 PM September 10, 2015

2015-09-10 - Baudin text to Dulberg:

Kelly is on the phone give me a minute

(815) 307-6197 12:58:10 PM September 10, 2015

2015-09-10 - Baudin text to Dulberg:

Ok

(815) 307-6197 2:29:06 PM September 10, 2015

2015-09-10 - Baudin text to Dulberg:

1230 Monday on?

(815) 307-6197 2:29:06 PM September 10, 2015

2015-09-10 - Baudin text to Dulberg:

Not on

(815) 307-6197 2:29:11 PM September 10, 2015

2015-09-10 - Dulberg text to Baudin:

Probably good but need to talk to barb later.
Will let you know today

(847)-497-4250 2:47:07 PM September 10, 2015

2015-09-10 - Baudin text to Dulberg:

Let us know or call Myrna at office to schedule

(815) 307-6197 2:47:34 PM September 10, 2015

2015-09-10 - Dulberg text to Baudin:

Ok

(847)-497-4250 2:47:54 PM September 10, 2015

2015-09-15 - Baudin text to Dulberg:

Agreement on way via email in five minutes

(815) 307-6197 1:31:11 PM September 15, 2015

2015-09-15 - Baudin text to Dulberg:

Sent ...

(815) 307-6197 1:38:44 PM September 15, 2015

2015-09-15 - Dulberg text to Baudin:

Mom is going in for surgery tomorrow and I need to be here for a few days afterwards to take care of her. Will get it back to you by end of week

(847)-497-4250 3:34:31 PM September 15, 2015

2015-09-15 - Dulberg text to Baudin:

Hopefully medical deps will be there by then s well

(847)-497-4250 3:36:34 PM September 15, 2015

2015-09-15 - Baudin text to Dulberg:

Perfect sounds good thanks if you have any questions call

(815) 307-6197 3:41:23 PM September 15, 2015

2015-09-15 - Baudin text to Dulberg:

Wish mom well

(815) 307-6197 3:41:29 PM September 15, 2015

2015-09-21 - Baudin text to Dulberg:

Hope mom is well. Are you available to talk for a minute?

(815) 307-6197 12:38:23 PM September 21, 2015

2015-09-21 - Baudin text to Dulberg:

I spoke with the bankruptcy attorney

(815) 307-6197 3:59:31 PM September 21, 2015

2015-09-21 - Dulberg text to Baudin:

Yes, must have missed your call

(847)-497-4250 4:20:27 PM September 21, 2015

2015-09-21 - Baudin text to Dulberg:

Il try again ...

(815) 307-6197 4:26:14 PM September 21, 2015

2015-09-21 - Dulberg text to Baudin:

Ok

(847)-497-4250 4:27:07 PM September 21, 2015

2015-09-21 - Dulberg text to Baudin:

I can be there at 11 am tomorrow

(847)-497-4250 5:17:04 PM September 21, 2015

2015-09-21 - Baudin text to Dulberg:

Ok. We have a phone appoint shortly there after but shouldn't be too long.

(815) 307-6197 5:18:00 PM September 21, 2015

2015-09-29 - Dulberg text to Baudin:

Have you been able to read through the case file and depositions yet?

(847)-497-4250 9:15:30 AM September 29, 2015

2015-09-29 - Baudin text to Dulberg:

Yes Kelly read if planning on reading some more tonight.

(815) 307-6197 9:32:40 AM September 29, 2015

2015-09-30 - Baudin text to Dulberg:

2015-09-30 - Baudin text to Dulberg:

Hi it's Randy

(815) 307-6197 11:28:39 AM September 30, 2015

2015-09-30 - Dulberg text to Baudin:

Hi , it's Paul

(847)-497-4250 12:55:26 PM September 30, 2015

2015-09-30 - Baudin text to Dulberg:

How much if anything did you get from bad guys moms insurance? Just the five thousand? Do you have the release?

(815) 307-6197 12:57:24 PM September 30, 2015

2015-09-30 - Dulberg text to Baudin:

Yes just 5k. Yes I have a copy of the release and so do you in that file

(847)-497-4250 12:58:21 PM September 30, 2015

2015-09-30 - Dulberg text to Baudin:

Need another copy?

(847)-497-4250 12:59:50 PM September 30, 2015

2015-09-30 - Baudin text to Dulberg:

I will dig it out of there.

(815) 307-6197 1:01:50 PM September 30, 2015

2015-09-30 - Dulberg text to Baudin:

Sorry

(847)-497-4250 1:02:45 PM September 30, 2015

2015-09-30 - Baudin text to Dulberg:

No problem

(815) 307-6197 1:12:46 PM September 30, 2015

2015-10-03 - Dulberg text to Baudin:

Any questions for me or anything I can do?

(847)-497-4250 9:23:03 AM October 03, 2015

2015-10-03 - Baudin text to Dulberg:

Yea. Please get me another copy of that release?

(815) 307-6197 9:48:45 AM October 03, 2015

2015-10-03 - Dulberg text to Baudin:

Will do

(847)-497-4250 9:49:05 AM October 03, 2015

2015-10-03 - Baudin text to Dulberg:

Thank you

(815) 307-6197 9:49:41 AM October 03, 2015

2015-10-03 - Dulberg text to Baudin:

Just sent it to Kelly's email

(847)-497-4250 11:23:25 AM October 03, 2015

2015-10-03 - Baudin text to Dulberg:

Thanks

(815) 307-6197 11:31:50 AM October 03, 2015

2015-10-09 - Dulberg text to Baudin:

Was that form I sent what you needed?

(847)-497-4250 9:47:21 AM October 09, 2015

2015-10-09 - Baudin text to Dulberg:

Yes sir

(815) 307-6197 10:09:05 AM October 09, 2015

2015-10-09 - Dulberg text to Baudin:

Do I need to do anything?

Hire an arborist etc...

(847)-497-4250 10:30:25 AM October 09, 2015

2015-10-09 - Baudin text to Dulberg:

That arborist--chainsaw fella was how much again

(815) 307-6197 1:46:42 PM October 09, 2015

2015-10-09 - Dulberg text to Baudin:

I think we figured 5-7 grand but that was just a guesstimate

(847)-497-4250 3:22:03 PM October 09, 2015

2015-10-09 - Dulberg text to Baudin:

If you know the local fella you used before can work I'm good with that

(847)-497-4250 3:23:37 PM October 09, 2015

2015-10-09 - Baudin text to Dulberg:

I like the chainsaw expert aspect

(815) 307-6197 3:29:54 PM October 09, 2015

2015-10-09 - Dulberg text to Baudin:

I trust your strategy. If you want the expert you got it. Just let me know who gets the check

(847)-497-4250 3:31:49 PM October 09, 2015

2015-10-09 - Baudin text to Dulberg:

Ok thanks b

(815) 307-6197 3:41:35 PM October 09, 2015

2015-10-09 - Baudin text to Dulberg:

No b just thanks

(815) 307-6197 3:41:47 PM October 09, 2015

2015-10-16 - Dulberg text to Baudin:

So, what's the plan for next Tuesday's court date?

(847)-497-4250 10:37:15 AM October 16, 2015

2015-10-16 - Baudin text to Dulberg:

Enter our appearance. got through a couple more of the medical deps the one orthopedic was not very helpful

(815) 307-6197 10:47:57 AM October 16, 2015

2015-10-16 - Dulberg text to Baudin:

Take it that was dr Sagerman

(847)-497-4250 10:51:28 AM October 16, 2015

2015-10-16 - Dulberg text to Baudin:

He said the elbow injury was too distal from the cut to be caused by the chainsaw blade but I'm not claiming the chainsaw blade cut the elbow.

He also won't recommend anyone be disabled if all they do is ""sit in front of a computer"" only thing is I didn't just sit in front of a computer, I had to type and work at a fast professional pace for long hours and that's not even remotely close to being possible anymore.

Dr Kujawa said dr Sagerman was wrong and is willing to testify to that

(847)-497-4250 11:08:27 AM October 16, 2015

2015-10-16 - Dulberg text to Baudin:

I'd embrace his testimony rather than fight it

(847)-497-4250 11:14:21 AM October 16, 2015

2015-10-16 - Baudin text to Dulberg:

Oh gosh, I don't disagree with you I'm just saying he wasn't favorable.

(815) 307-6197 11:16:20 AM October 16, 2015

2015-10-16 - Dulberg text to Baudin:

He was defending himself from a lawsuit. That's all

(847)-497-4250 11:18:09 AM October 16, 2015

2015-10-16 - Dulberg text to Baudin:

He can't connect the dots he didn't see the event happen

(847)-497-4250 11:18:45 AM October 16, 2015

2015-10-16 - Dulberg text to Baudin:

Didn't mean to go off, just shed light on his opinions.
See you on Tuesday then?

(847)-497-4250 11:23:20 AM October 16, 2015

2015-10-16 - Baudin text to Dulberg:

Yep

(815) 307-6197 11:58:39 AM October 16, 2015

2015-10-20 - Dulberg text to Baudin:

I was there, where were you'?

(847)-497-4250 10:56:30 AM October 20, 2015

2015-10-20 - Dulberg text to Baudin:

Hope nothing bad happened

(847)-497-4250 1:09:01 PM October 20, 2015

2015-10-30 - Dulberg text to Baudin:

Morning Randy,
Here is your one week reminder that we have a court date at 9 am in front of judge Meyer at the McHenry County Courthouse
If you need anything don't hesitate to ask
Paul

(847)-497-4250 9:35:32 AM October 30, 2015

2015-10-30 - Baudin text to Dulberg:

In there yep

(815) 307-6197 9:40:22 AM October 30, 2015

2015-11-05 - Dulberg text to Baudin:

Reminder, Tomorrow 9 am, judge Meyer

(847)-497-4250 11:18:48 AM November 05, 2015

2015-11-05 - Baudin text to Dulberg:

We will be there with smiling faces

(815) 307-6197 11:24:03 AM November 05, 2015

2015-11-06 - Dulberg text to Baudin:

Thank you for coming today,
I sent the arborist information to Myrna with some notes about the tree and the area along with a photo of the exact same kind of tree approximately the same size only a few blocks away from the McGuire's property for comparison.
Was the next court date January 25th?

(847)-497-4250 11:42:15 AM November 06, 2015

2015-11-06 - Baudin text to Dulberg:

Date is January 28 the clerk called me

(815) 307-6197 11:54:23 AM November 06, 2015

2015-11-17 - Dulberg text to Baudin:

Did you talk to the arborist?

(847)-497-4250 10:43:39 AM November 17, 2015

2015-11-17 - Baudin text to Dulberg:

On the list of to do's sir.

(815) 307-6197 11:01:33 AM November 17, 2015

2015-11-17 - Dulberg text to Baudin:

Anything you need or I need to do?

(847)-497-4250 11:02:28 AM November 17, 2015

2015-11-17 - Baudin text to Dulberg:

Not yet sir Myrna, our assistant has been in the Carolinas for several days, mary was on a cruise, and Jennifer and Edith have been busy helping my dad f

(815) 307-6197 11:03:14 AM November 17, 2015

2015-11-17 - Baudin text to Dulberg:

inish up a brief so Kelly and I have been running on a skeleton crew

(815) 307-6197 11:03:15 AM November 17, 2015

2015-11-17 - Dulberg text to Baudin:

No problem and thank you

(847)-497-4250 11:04:29 AM November 17, 2015

2015-11-30 - Dulberg text to Baudin:

Hope you had a good thanksgiving

(847)-497-4250 2:29:55 PM November 30, 2015

2015-12-11 - Dulberg text to Baudin:

Morning Randy

Noticed the check for the arborist hasn't been cashed yet
Was it sent to him or is your firm cashing it?

(847)-497-4250 8:39:29 AM December 11, 2015

2015-12-22 - Dulberg text to Baudin:

2015-12-22 - Dulberg text to Baudin:

Morning Randy,
Our chainsaw expert cashed the check.
Hope you both have a wonderful holiday!
Paul

(847)-497-4250 8:55:05 AM December 22, 2015

2015-12-22 - Baudin text to Dulberg:

He also has some deps and medical records----

(815) 307-6197 9:17:53 AM December 22, 2015

2016-01-04 - Dulberg text to Baudin:

Morning Randy,
Hope your holidays were good
Wondering if our chainsaw expert got back to us yet

(847)-497-4250 10:20:38 AM January 04, 2015

2016-01-04 - Baudin text to Dulberg:

Not yet sir

(815) 307-6197 10:20:57 AM January 04, 2015

2016-01-04 - Dulberg text to Baudin:

Thanks sir

(847)-497-4250 11:07:08 AM January 04, 2015

2016-01-19 - Dulberg text to Baudin:

Hi Randy,
Mom (Barb) says you should see this because it's very similar.

<http://www.horwitzlaw.com/blog/workers-compensation/horwitz-recovers-record-5-745-million-jury-verdict-for-local-10-carpenter/>

(847)-497-4250 10:40:44 AM January 19, 2015

2016-02-09 - Dulberg text to Baudin:

Hi Randy,
Please give me a call
Paul
847-497-4250

(847)-497-4250 4:30:25 PM February 09, 2015

2016-02-09 - Baudin text to Dulberg:

On phone. You doing ok?

(815) 307-6197 4:43:58 PM February 09, 2015

2016-02-09 - Baudin text to Dulberg:

Tried you did not work

(815) 307-6197 5:57:07 PM February 09, 2015

2016-02-10 - Dulberg text to Baudin:

Morning Randy,

I just wanted to say I will be at court tomorrow morning and to tell Kelly not to proceed with plans for the arbitration thingy till we get a chance to talk tomorrow.

Paul

(847)-497-4250 7:42:04 AM February 10, 2015

2016-02-11 - Dulberg text to Baudin:

Hi Randy,

Seen Dr. Kujawa today and set up another appointment for August 5th.

She said for you to contact her for whatever you need and if I need to sign a release form I can do that.

She reaffirmed that this is a permanent injury induced by severe trauma to the arm and is willing to do a deposition stating such.

She told my mom and I that I will have to take the medication for several years and possibly for the rest of my life and all that can be done is subtle changes in dosage to find what works best.

What happened in court today and when is the next court date?

Thanks for everything,

Paul

(847)-497-4250 3:07:56 PM February 11, 2015

2016-02-11 - Baudin text to Dulberg:

ist materials and see if they will retain additional experts.

(815) 307-6197 3:14:58 PM February 11, 2015

2016-02-11 - Baudin text to Dulberg:

OK we will put a letter together to send to the doctor. The judge set it for 30 days out to give the other side an opportunity to review the dr and arbor

(815) 307-6197 3:14:58 PM February 11, 2015

2016-02-11 - Dulberg text to Baudin:

30 days makes it on Saturday the 12th

Is that correct?

(847)-497-4250 3:17:34 PM February 11, 2015

2016-02-11 - Baudin text to Dulberg:

3/17/16 0900hrs room 201

(815) 307-6197 3:18:42 PM February 11, 2015

2016-02-11 - Dulberg text to Baudin:

Should we Wear green?

(847)-497-4250 3:19:47 PM February 11, 2015

2016-02-11 - Dulberg text to Baudin:

Just kidding...

St Patrick's day joke

Let me know if you need anything and thanks again

(847)-497-4250 3:21:27 PM February 11, 2015

2016-02-11 - Baudin text to Dulberg:

Will do, yes wear green and see green.

(815) 307-6197 3:22:36 PM February 11, 2015

2016-02-11 - Dulberg text to Baudin:

Something bothered me about today.

Both you and Kelly told me the policy limits were 300k and that you got that information from talking to the new defense attorney.

However, when judge Meyer called the case the new defense attorney acted as if she didn't even know this was her case.

Who, when and where did you get the 300k information?

(847)-497-4250 4:03:39 PM February 11, 2015

2016-02-11 - Dulberg text to Baudin:

From?

(847)-497-4250 4:04:14 PM February 11, 2015

2016-02-11 - Baudin text to Dulberg:

I think perry mentioned that amount. I asked for confirmation via email to new defense lawyer today.

(815) 307-6197 4:05:45 PM February 11, 2015

2016-02-11 - Dulberg text to Baudin:

I want to officially see the actual policy and have a copy to take and read for myself.

Don't know if perry lied to Hans mast or Hans lied to me. Either way I don't care. I want an official copy of the policy. I no longer trust anyone from or working for Allstate to say the truth

(847)-497-4250 4:11:23 PM February 11, 2015

2016-02-11 - Dulberg text to Baudin:

Also, on another note.

The Defendant claimed he owned a business for twenty plus years.

He also claimed he was being paid to take down the tree.

Does the defendant have business insurance?

I'm sure you have it. I know I carried it.

Does the defendant?

(847)-497-4250 4:29:31 PM February 11, 2015

2016-02-11 - Dulberg text to Baudin:

Sorry for the rant but these I hope are good questions.

You said look for the green

Thanks, Paul

(847)-497-4250 4:35:00 PM February 11, 2015

2016-03-16 - Dulberg text to Baudin:

Hi Randy,

Just want to confirm, 9am before Judge Meyer tomorrow?

Thanks,

Paul

(847)-497-4250 1:20:23 PM March 16, 2015

2016-03-16 - Baudin text to Dulberg:

Yes sir

(815) 307-6197 2:52:15 PM March 16, 2015

2016-06-15 - Dulberg text to Baudin:

Hi Randy,

A family emergency happened and I'm traveling to Florida and won't be in town for 3-4 days.

I'll still be available by phone or text.

Paul

Paul Dulberg

847-497-4250

(847)-497-4250 10:14:40 AM June 15, 2015

2016-06-15 - Baudin text to Dulberg:

Hope all is ok. I'm off to Florida tomorrow. I am working in your case as we speak and just left a message for the defense lawyer. I am running an asse

(815) 307-6197 10:16:51 AM June 15, 2015

2016-06-15 - Baudin text to Dulberg:

t check on gagnon and that way I will be better able to advise you on how to proceed. Travel safe

(815) 307-6197 10:16:52 AM June 15, 2015

Special Note: Below texts from Randy Baudin Jr. are from a different phone number.

2016-07-10 - Baudin text to Dulberg:

Hi it's randy. Coming to court tomorrow?

(815) 814-2193 7:57 PM July 10, 2016

2016-07-10 - Dulberg text to Baudin:

I just checked and last I knew it was scheduled for September 23rd for pretrial . If we have court tomorrow I will be there. What time?

(847) 497-4250 8:01 PM July 10, 2016

2016-07-10 - Baudin text to Dulberg:

There is court at nine. Allstate filed some motions. Prolly not going to be heard but want to talk to judge and see if he will speak to us all

(815) 814-2193 8:05 PM July 10, 2016

2016-07-10 - Dulberg text to Baudin:

Ok I'll be there

(847) 497-4250 8:07 PM July 10, 2016

2016-07-10 - Baudin text to Dulberg:

Great

(815) 814-2193 8:07 PM July 10, 2016

2016-07-10 - Dulberg text to Baudin:

Morning Randy, Mom and I have been talking about how to move forward. Please give me a call to discuss Thanks, Paul

(847) 497-4250 8:17 AM July 12, 2016

2016-07-12 - Dulberg text to Baudin:

847-497-4250

(847) 497-4250 8:21 AM July 12, 2016

2016-07-15 - Baudin text to Dulberg:

Kelly and I would like speak with you and your mom Monday night at 6PM

Kelly and I would like speak with you and your mom Monday night at 630

(815) 814-2193 2:22 PM July 15, 2016

2016-07-15 - Dulberg text to Baudin:

Okay, Monday the 18th at 6:30 pm. Do we need to bring anything?

(847) 497-4250 2:27 PM July 15, 2016

2016-07-15 - Baudin text to Dulberg:

Maybe the social security report if you have it? We will Jameson's Charhouse crystal lake at 630 in meeting room there.

(815) 814-2193 2:29 PM July 15, 2016

2016-07-15 - Baudin text to Dulberg:

And yes 18th

(815) 814-2193 2:29 PM July 15, 2016

2016-07-15 - Dulberg text to Baudin:

I don't have a report from social security but I did send Myrna the contact information for the lawyer handling it. I don't know that a final report would be generated yet since I'm still waiting for the next hearing to be scheduled but I'm sure Meredith the lawyer would know more than I do.

(847) 497-4250 2:37 PM July 15, 2016

2016-07-15 - Baudin text to Dulberg:

Ok

(815) 814-2193 2:37 PM July 15, 2016

2016-07-18 - Dulberg text to Baudin:

Still on for tonight?

(847) 497-4250 4:26 PM July 18, 2016

2016-07-18 - Baudin text to Dulberg:

Yes sir.

(815) 814-2193 4:26 PM July 18, 2016

2016-07-18 - Dulberg text to Baudin:

Are we doing dinner?

(847) 497-4250 4:27 PM July 18, 2016

2016-07-18 - Baudin text to Dulberg:

You can eat we were going to get appetizers. We are to meet there as there is more space.

(815) 814-2193 4:39 PM July 18, 2016

2016-07-18 - Dulberg text to Baudin:

Should I bring my notes on the deps?

(847) 497-4250 4:40 PM July 18, 2016

2016-07-18 - Baudin text to Dulberg:

If you want, want to talk more about strategy and thoughts on the case

(815) 814-2193 4:44 PM July 18, 2016

2016-07-18 - Dulberg text to Baudin:

I'll leave the deps at home, too much for me to lug around. See you at 6:30

(847) 497-4250 4:47 PM July 18, 2016

2016-07-18 - Baudin text to Dulberg:

Thanks. See you then.

(815) 814-2193 4:48 PM July 18, 2016

2016-07-18 - Dulberg text to Baudin:

Would we be in a better position if the SSDI decision was already in and would that make a difference in the amount the arbitration judge would award?

(847) 497-4250 8:54 PM July 18, 2016

2016-07-18 - Baudin text to Dulberg:

No we have the dr reports. You can tell the judge about it in mediation as well. More informal and you can get more info in without being restricted by r

(815) 814-2193 8:56 PM July 18, 2016

2016-07-18 - Baudin text to Dulberg:

ules of evidence. And I can't promise in a trial they won't bring the felony drug charges up. Believe me the binding mediation is the best route.

(815) 814-2193 8:56 PM July 18, 2016

2016-07-18 - Baudin text to Dulberg:

We are in the best spot now with the momentum on our side and being able to present your case in mediation without any new

testimony from defendant

(815) 814-2193 9:00 PM July 18, 2016

2016-07-18 - Dulberg text to Baudin:

If we went to trial I'm not worried about those drug charges. I've had to explain myself about that for decades. It's pretty simple, I screwed up at a young age, was honest about it, admitted my wrong and took my punishment. Then I moved on with life, worked hard for 17 years for many employers in this county who all have nothing but good things to say about my time with them while at the same time I created a legitimate business that lasted 12 years till this incident. I believe my past felony will be a non issue because it actually shows a lot about my character, being honest when I'm in the wrong is something most people won't do even if being honest cost me a few years. If Allstate does bring it up, their own client did the same thing only worse, he and his whole family was caught dealing drugs only to underage kids and he was the ringleader. They were just lucky that when they got caught it was before mandatory sentences for those offenses were in place. but it doesn't change what they did, exploiting underage children with drugs for money is far worse than my simple possession charge. I have the actual police reports if we need them. If this does go to trial, Allstate lawyers had better read the depositions of their client and his family. if they do I don't believe their going to put their client or anyone from his family on the stand just to purger themselves over and over again in front of a jury unless the want to lose. All they have is possibly some dr who isn't impartial questioning the results of the dr's I was sent to see. In the end after the Dr's have it out on the stand all that remains is me who nearly died, had 40% of my arm severed and the edges turned to hamburger by a chainsaw then just stitched back together with a few threads with hope that I might get some use yet. Well I do have limited use but it's not enough to do the daily functions we all need to do in order to take care of ourselves and it doesn't take a Ph.D. to see or understand that a chainsaw does that. Ok, I realize I just ranted a lot but its all good. I'll let you know in the morning

(847) 497-4250 10:09 PM July 18, 2016

2016-07-18 - Baudin text to Dulberg:

So sorry came in garbled. Are you taking our recommendation as to the binding mediation?

(815) 814-2193 10:12 PM July 18, 2016

2016-07-18 - Dulberg text to Baudin:

You will have an answer tomorrow

(847) 497-4250 10:13 PM July 18, 2016

2016-07-18 - Baudin text to Dulberg:

Ok. Sleep well.

(815) 814-2193 10:13 PM July 18, 2016

2016-07-19 - Dulberg text to Baudin:

Sorry but I want to get this to you while its fresh Please answer this in the morning How are costs and attorney fees handled in binding arbitration? Do they come out of the award or are they in addition to the award like a trial?

(847) 497-4250 12:23 AM July 19, 2016

2016-07-19 - Baudin text to Dulberg:

Both Handled the same as trail.

(815) 814-2193 3:57 AM July 19, 2016

2016-07-19 - Dulberg text to Baudin:

Does that mean your fees and costs are awarded separate from the award or do they still come out of the 300k cap?

(847) 497-4250 7:02 AM July 19, 2016

2016-07-19 - Baudin text to Dulberg:

If at trial and win 300 max Costs not above that. Same as mediation. We can ask for judge to award costs in both. Up to judge to award. Also costs mean

(815) 814-2193 7:06 AM July 19, 2016

2016-07-19 - Baudin text to Dulberg:

filing fee service fee. Not the costs like experts bills Etc

(815) 814-2193 7:06 AM July 19, 2016

2016-07-19 - Dulberg text to Baudin:

We are thinking that if we can get Allstate to agree in advance and in writing to cover your % (fee) and all the costs including deposition fees, expert witness fees and medical above and beyond any award the arbiter sees fit then we would be willing to go forward. Let's just see if they are open to it

(847) 497-4250 7:54 AM July 19, 2016

2016-07-19 - Baudin text to Dulberg:

They won't. The judge will decide what the award is and that is the award. We again urge you to do the binding mediation.

(815) 814-2193 7:56 AM July 19, 2016

2016-07-19 - Dulberg text to Baudin:

I just read the statute on arbitration and it seems to me that your fees and all the costs can be agreed to in advance with the exception of fees for the arbitration itself. I need to feel that there is something covered. Particularly the monies we already laid out otherwise just the momentum in our favor isn't enough because the momentum has always been in our favor. It doesn't hurt to ask Allstate if they would agree to pay these separate from the award

(847) 497-4250 8:10 AM July 19, 2016

2016-07-19 - Dulberg text to Baudin:

In essence Allstate is already setting terms on us not to go after their clients personal assets. Irregardless if their are any assets. So I think it's only fair that they cover fees and costs in advance

(847) 497-4250 8:18 AM July 19, 2016

2016-07-19 - Dulberg text to Baudin:

They are the ones pushing for arbitration correct? Why?

(847) 497-4250 8:40 AM July 19, 2016

2016-07-19 - Dulberg text to Baudin:

I have to run to the dr's appointment. I'd tell Kelly to ask that Allstate wait till possibly Thursday for their answer. It's not like it cost them anything

(847) 497-4250 8:47 AM July 19, 2016

2016-07-19 - Baudin text to Dulberg:

I told you they don't care if we arbitrate. We as your lawyers say that it is the best that you do the binding mediation. We are deciding this based on f

(815) 814-2193 10:07 AM July 19, 2016

2016-07-19 - Baudin text to Dulberg:

acts and odds as to give you the best outcome. It appears to me that you are still looking for some justification or rationalization to carry on as if i

(815) 814-2193 10:07 AM July 19, 2016

2016-07-19 - Baudin text to Dulberg:

t will make it better. It won't. This will give you the best possible outcome.

(815) 814-2193 10:07 AM July 19, 2016

2016-07-19 - Dulberg text to Baudin:

Randy, Yes arbitration is appealing because it saves a few thousand dollars and maybe a few years but I don't like the idea of being blindly boxed in on their terms alone without any assurances as to your fees, medical expenses or even what we spent out of pocket in costs to get here. I want some assurances/concessions on their part prior to walking in or it's no deal. Going in blind with no assurances, I can't help but to feel like a cow being herded thinking its dinner time but it's really slaughter time. They need to give somewhere prior to arbitration or it's a good indication as to how they will negotiate once we start. In other wards, if they won't concede anything prior to arbitration then they won't negotiate or concede anything once the arbitration starts and if that's the case, what's the point. We need something to show they are sincere in trying to resolve this. Up the lower limits from 50k to 150k, concede on the medical portion, out of pocket expenses, attorneys fees or how about just resolving their portion and leave their chainsaw wielding idiot open to defend himself in this lawsuit. Perhaps they can give on something I haven't thought of yet, Anything will do but giving on nothing prior to walking in there spells out what I'm going to get and if that's the case then I'll spend money and roll the dice. Convince me I'm not going being lead to slaughter and I'll agree

(847) 497-4250 1:46 PM July 19, 2016

2016-07-19 - Dulberg text to Baudin:

To do it

(847) 497-4250 1:58 PM July 19, 2016

2016-07-19 - Baudin text to Dulberg:

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

(815) 814-2193 4:28 PM July 19, 2016

2016-07-19 - Dulberg text to Baudin:

... ..

When you have some time call me. We have questions

(847) 497-4250 4:44 PM July 19, 2016

2016-07-19 - Dulberg text to Baudin:

You mentioned something about structured settlement Please give me a quick education on it When your done of coarse

(847) 497-4250 6:56 PM July 19, 2016

2016-07-20 - Dulberg text to Baudin:

Ok, I have to ask about rules of evidence in a trial vs. arbitration I know that you said it gives me the personal ability to talk with the arbiter about things that would not be allowed at a trial. My question is, is that a two way street, can the defense pull crap that would never be allowed at trial?

(847) 497-4250 8:43 AM July 20, 2016

2016-07-20 - Baudin text to Dulberg:

They have no ammo. We have dr opinion unscathed and tree expert unscathed bad guy won't be there you will. So we have advantage

(815) 814-2193 10:00 AM July 20, 2016

2016-07-20 - Dulberg text to Baudin:

Will there be some sort of gag order on me? In other wards does this stop me from talking about it in the future?

(847) 497-4250 10:21 AM July 20, 2016

2016-07-20 - Dulberg text to Baudin:

Yes, no?

(847) 497-4250 10:56 AM July 20, 2016

2016-07-20 - Baudin text to Dulberg:

I doubt there will be any type of confidentiality clause as a part of the settlement

(815) 814-2193 11:03 AM July 20, 2016

2016-07-20 - Dulberg text to Baudin:

Can depositions be used?

(847) 497-4250 11:05 AM July 20, 2016

2016-07-20 - Baudin text to Dulberg:

Yes

(815) 814-2193 11:06 AM July 20, 2016

2016-07-20 - Dulberg text to Baudin:

Can phone, text, emails, videos or audio recordings be used?

(847) 497-4250 11:07 AM July 20, 2016

2016-07-20 - Baudin text to Dulberg:

There aren't any restrictions on what we say or do with the judge when we are with him in private. He will give it as much weight or credibility as he sees

(815) 814-2193 11:09 AM July 20, 2016

2016-07-20 - Baudin text to Dulberg:

What we say or do fits, but we can do or say whatever we want to him when we meet. Unlike a trial

(815) 814-2193 11:09 AM July 20, 2016

2016-07-20 - Dulberg text to Baudin:

Can video or phone calls be used by us or the defense to reach outside the proceeding to clarify or substantiate any claims made by us or them

(847) 497-4250 11:11 AM July 20, 2016

2016-07-20 - Dulberg text to Baudin:

Correction; can video or phone calls be made during the proceedings that can Clarify, substantiate or rebuke any claims made? You know what I mean

(847) 497-4250 11:20 AM July 20, 2016

2016-07-20 - Baudin text to Dulberg:

Like you want to call somebody during the proceeding

(815) 814-2193 11:21 AM July 20, 2016

2016-07-20 - Baudin text to Dulberg:

What will be of greatest importance is the nature extent and permanence of your injury

(815) 814-2193 11:22 AM July 20, 2016

2016-07-20 - Baudin text to Dulberg:

And just so you understand, as far as the judges concerned I feel that he is going to attribute very little if any negligence to you the matter that he

(815) 814-2193 11:23 AM July 20, 2016

2016-07-20 - Dulberg text to Baudin:

2016-07-20 - Dulberg text to Baudin:

From my understanding, they can have an army of professional witnesses ready at the touch of a button ready to tell the judge anything they wish? Is this a possibility?

(847) 497-4250 11:25 AM July 20, 2016

2016-07-20 - Baudin text to Dulberg:

If we go to trial they sure will. They have no IME they have no rebut to tree expert. Again we are in the best position now to get the maximum recovery

(815) 814-2193 11:31 AM July 20, 2016

2016-07-20 - Dulberg text to Baudin:

Yes but they can call anyone or produce in writing anything they wish with no restrictions at the arbitration correct

(847) 497-4250 11:34 AM July 20, 2016

2016-07-20 - Baudin text to Dulberg:

They could. But we will be there to refute anything. Again, the actual person, you. Not a document.

(815) 814-2193 11:41 AM July 20, 2016

2016-07-20 - Baudin text to Dulberg:

All right, 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

(815) 814-2193 11:44 AM July 20, 2016

2016-07-20 - Baudin text to Dulberg:

ing on and make arrangements regarding additional counsel. Again, as your attorneys we are strongly urging you to participate in the binding mediation. It

(815) 814-2193 11:44 AM July 20, 2016

2016-07-20 - Baudin text to Dulberg:

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

(815) 814-2193 11:44 AM July 20, 2016

2016-07-20 - Baudin text to Dulberg:

gives us the most control of the situation.

(815) 814-2193 11:44 AM July 20, 2016

2016-07-20 - Dulberg text to Baudin:

So they can bring the defendants in via phone. video. text etc... Even if they are not in the physical location nor listed as anyone

attending?

(847) 497-4250 11:45 AM July 20, 2016

2016-07-20 - Baudin text to Dulberg:

Show Sean will be there in an adjuster will be there either by telephone or in person. She will present a submission to the judge laying out there view o

(815) 814-2193 11:47 AM July 20, 2016

2016-07-20 - Baudin text to Dulberg:

f the case. Then she will speak their behalf and argue from the depositions that have already been presented. There's not going to be any testimony given

(815) 814-2193 11:47 AM July 20, 2016

2016-07-20 - Dulberg text to Baudin:

Also, if they're in a separate room and we are not privy to anyone their conversation how can we refute what's going on?

(847) 497-4250 11:47 AM July 20, 2016

2016-07-20 - Baudin text to Dulberg:

during this proceeding. We can talk to him in private but there's no questioning no answers no cross-exam. You're really overthinking this. Just stop an

(815) 814-2193 11:47 AM July 20, 2016

2016-07-20 - Baudin text to Dulberg:

d listen to your lawyers' advice that's why you hire us.

(815) 814-2193 11:47 AM July 20, 2016

2016-07-20 - Baudin text to Dulberg:

The judge will tell us what their arguments are and he will tell them what our arguments are. Did we tell the judge why we think that's not true, and con

(815) 814-2193 11:48 AM July 20, 2016

2016-07-20 - Baudin text to Dulberg:

versely they do the same

(815) 814-2193 11:48 AM July 20, 2016

2016-07-20 - Baudin text to Dulberg:

I'm going into a meeting. I will have about five minutes coming up in an hour, during that time I have to have an answer. I ask that you believe in us a

(815) 814-2193 11:51 AM July 20, 2016

2016-07-20 - Baudin text to Dulberg:

and what we've done for you so far, we haven't misled or put you down the wrong path, just have faith.

(815) 814-2193 11:51 AM July 20, 2016

2016-07-20 - Dulberg text to Baudin:

Ok, in an hour then

(847) 497-4250 11:52 AM July 20, 2016

2016-07-20 - Baudin text to Dulberg:

Yes binding mediation?

(815) 814-2193 1:04 PM July 20, 2016

2016-07-20 - Dulberg text to Baudin:

Randy, I truly appreciate yours and Kelly's honest advice and I hope I continue to receive it in the future. Please don't take this personal because it's not. I value everything you have to offer more than you know. I will be moving forward with litigation at this time. However, should Allstate consider a full settlement with no strings attached in the future so they can save the cost of litigation or a humiliating defeat I'm not opposed to entertaining it and most likely will accept it. This is too important to me and my family. 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. Thank you both for your honest advice now let's move forward together and enjoy winning this case together.

(847) 497-4250 1:24 PM July 20, 2016

2016-07-20 - Dulberg text to Baudin:

Was that response garbled broken up text or did it go through ok?

(847) 497-4250 1:49 PM July 20, 2016

2016-07-20 - Baudin text to Dulberg:

You available to talk with your mother as well on the phone in a half hour or so

(815) 814-2193 3:59 PM July 20, 2016

2016-07-20 - Dulberg text to Baudin:

Tomorrow morning, 9am, judge Meyers?

(847) 497-4250 3:59 PM July 20, 2016

2016-07-20 - Baudin text to Dulberg:

Yes but on the phone in a half hour

(815) 814-2193 4:00 PM July 20, 2016

2016-07-20 - Dulberg text to Baudin:

Yes on the phone in a half hour is ok but mom is off with grandkids

(847) 497-4250 4:02 PM July 20, 2016

2016-07-20 - Baudin text to Dulberg:

Ok

(815) 814-2193 4:18 PM July 20, 2016

2016-07-21 - Dulberg text to Baudin:

Think you two can get me that copy of the policy soon?

(847) 497-4250 12:41 PM July 21, 2016

2016-07-21 - Dulberg text to Baudin:

Randy, please read page 1 coverage cushion of the gagnon policy. It extends coverage to 120% That's 60k more

(847) 497-4250 6:28 PM July 21, 2016

2016-07-21 - Dulberg text to Baudin:

Page 2 guest medical may be an extra 1k

(847) 497-4250 6:37 PM July 21, 2016

2016-07-21 - Dulberg text to Baudin:

Please let Kelly know that I want the high end of the Adr policy limit increased by 20% along with adding 20% to and judgement below the high end limit

(847) 497-4250 7:00 PM July 21, 2016

2016-07-21 - Dulberg text to Baudin:

Oh yeah, your thoughts of him being dropped is a joke. His Gold coverage says he cannot be dropped no matter how many claims are made. Just thought you'd like to know that. You really should read the policy

(847) 497-4250 7:09 PM July 21, 2016

2016-07-26 - Baudin text to Dulberg:

Hi it's Randy.

(815) 814-2193 3:29 PM July 26, 2016

2016-07-27 - Dulberg text to Baudin:

Morning, sorry I missed your texts

(847) 497-4250 9:25 AM July 27, 2016

2016-07-27 - Dulberg text to Baudin:

What do you need

(847) 497-4250 9:25 AM July 27, 2016

2016-07-27 - Baudin text to Dulberg:

I'll give you a call around four-ish I just wanted to address some of your concerns about the policy etc.

(815) 814-2193 11:06 AM July 27, 2016

2016-07-27 - Dulberg text to Baudin:

Okay

(847) 497-4250 11:07 AM July 27, 2016

2016-07-27 - Dulberg text to Baudin:

Just so you know, just received a letter from the Social Security Administration and its a Notice of Affirmation and order of Appeals Council Remanding Case back to the Administrative Law Judge

(847) 497-4250 11:14 AM July 27, 2016

2016-07-27 - Baudin text to Dulberg:

Great

(815) 814-2193 11:14 AM July 27, 2016

2016-07-27 - Dulberg text to Baudin:

Thank goodness that I kept the right to review by an appeal

(847) 497-4250 11:21 AM July 27, 2016

2016-07-28 - Dulberg text to Baudin:

Morning Randy, If there was some sort of business contract between Gagnon and his Parents why couldn't any of them even come close as to what the terms were? Secondly, where are the cashed checks or contract? I was there the day this happened. I didn't hear anything that sounded like it was more than a son doing work for his parents as a favor. Nothing more. This seems to me to be yet another ploy to negate their financial responsibility and was conceived of after the fact.

(847) 497-4250 6:17 AM July 28, 2016

2016-07-28 - Dulberg text to Baudin:

If I remember correctly, David said in his dep that he was elected to do the work. Why say elected if he was contracted?

(847) 497-4250 6:24 AM July 28, 2016

2016-07-28 - Baudin text to Dulberg:

Sorry, I'm driving and it looks garbled again. But it says if there's an agreement or contract so I'm guessing, if he knows what is not going to give you

(815) 814-2193 6:47 AM July 28, 2016

2016-07-28 - Baudin text to Dulberg:

coverage, he will testify that way. But he has already testified that he was receiving \$15 an hour, and that you were going to get the same. What you ge

(815) 814-2193 6:47 AM July 28, 2016

2016-07-28 - Baudin text to Dulberg:

t is a relevant or what you got, and I know you didn't get paid. It's also irrelevant whether or not he actually got paid, especially in light of how it

(815) 814-2193 6:47 AM July 28, 2016

2016-07-28 - Baudin text to Dulberg:

turned out, I guess it's just whether or not there was an agreement and it didn't have to be in writing. If at trial, they all say that there was some a

(815) 814-2193 6:47 AM July 28, 2016

2016-07-28 - Baudin text to Dulberg:

greement or in an action to exclude coverage before trial, i'm guessing they're all going to be on the same page. The issue as to whether or not there is

(815) 814-2193 6:47 AM July 28, 2016

2016-07-28 - Baudin text to Dulberg:

coverage, is different from the trial. That's a trial before the trial and that is something that we would have to win.

(815) 814-2193 6:47 AM July 28, 2016

2016-07-28 - Dulberg text to Baudin:

Since they didn't think enough ahead of the dep to get their storylines straight as to the payment/terms for this supposed agreement I believe that is enough to show there was no agreement and this is just another fabrication. Not unlike the other fabrications created throughout their deps. It is an obvious pattern. Expose it and their done even in front of a conservative jury or a trained judge acting as an bait or or mediator

(847) 497-4250 6:53 AM July 28, 2016

2016-07-28 - Dulberg text to Baudin:

2016-07-28 - Dulberg text to Baudin:

Bait means arbiter

(847) 497-4250 6:54 AM July 28, 2016

2016-07-28 - Baudin text to Dulberg:

This issue will not come to fruition and biding mediation. The Allstate in-house lawyers have not put two and two together

(815) 814-2193 6:56 AM July 28, 2016

2016-07-28 - Dulberg text to Baudin:

They have to prove this claim and they can't.

(847) 497-4250 6:57 AM July 28, 2016

2016-07-28 - Dulberg text to Baudin:

Am I allowed to make erroneous claims without proof? If not, why would their erroneous claims without proof be allowed?

(847) 497-4250 7:00 AM July 28, 2016

2016-07-28 - Baudin text to Dulberg:

It would be something called dec action which would be brought by ALLSTATE. Yes evidence would be presented but there aren't any guarantees regarding wha

(815) 814-2193 7:02 AM July 28, 2016

2016-07-28 - Baudin text to Dulberg:

t the judge would decide

(815) 814-2193 7:02 AM July 28, 2016

2016-07-28 - Dulberg text to Baudin:

I'm sure any experienced judge would see this for what it is. A fraudulent attempt to negate any and all financial responsibility for the wreck less actions committed that day. They have no proof other than the words of those who already lied under oath

(847) 497-4250 7:06 AM July 28, 2016

2016-07-28 - Dulberg text to Baudin:

Dozens of times

(847) 497-4250 7:06 AM July 28, 2016

2016-07-28 - Baudin text to Dulberg:

I'm sure a rational experience judge would think so, but those are few and far between. That's why the law books are full of appeals. The legal system i

(815) 814-2193 7:11 AM July 28, 2016

2016-07-28 - Baudin text to Dulberg:

s not fair, and not rational. Otherwise things could just be input into a computer and the answer would spit out.

(815) 814-2193 7:11 AM July 28, 2016

2016-07-28 - Dulberg text to Baudin:

If someone hits you with their car does it matter if they were being paid to drive that car? If not how is this any different?

(847) 497-4250 7:13 AM July 28, 2016

2016-07-28 - Baudin text to Dulberg:

Actually that does, a lot of car policies exclude paid for hire. Also, every type of policy affords different types of coverage and has different exclusi

(815) 814-2193 7:14 AM July 28, 2016

2016-07-28 - Baudin text to Dulberg:

ons so homeowners policies are different than car policies

(815) 814-2193 7:14 AM July 28, 2016

2016-07-28 - Dulberg text to Baudin:

I have a question that's related but different. Why were the defendants privy to my deposition prior to giving their own? Carol slipped in her dep and said things she couldn't have known unless someone coached her and gave her inside information about my deposition. If this happened, and clearly it is, what's to say they weren't coached to claim this was a contract just so he insurance company had an out?

(847) 497-4250 7:18 AM July 28, 2016

2016-07-28 - Baudin text to Dulberg:

I'm not sure who would've coached them because if this was an issue that ALLSTATE realized it would've been dealt with a long time ago

(815) 814-2193 7:20 AM July 28, 2016

2016-07-28 - Dulberg text to Baudin:

When it smells foul, it's foul.

(847) 497-4250 7:21 AM July 28, 2016

2016-07-28 - Baudin text to Dulberg:

Defendants certainly are foul.

(815) 814-2193 7:23 AM July 28, 2016

2016-07-28 - Dulberg text to Baudin:

Look, they claim it's a contract but when asked the details non of the parties supposedly involved with the contract can get any of the details even remotely the same. Like I said this is a ploy and nothing more

(847) 497-4250 7:23 AM July 28, 2016

2016-07-28 - Baudin text to Dulberg:

Yeah I'm not sure I don't know. Could be dabbing if they have a canceled check or something from previous work to say hey look we've paid him for doing s

(815) 814-2193 7:25 AM July 28, 2016

2016-07-28 - Baudin text to Dulberg:

tuff around the house before. But even if not you would have testimony that they had an agreement. Whether or not it's true is another story

(815) 814-2193 7:25 AM July 28, 2016

2016-07-28 - Dulberg text to Baudin:

Ploy means rouse

(847) 497-4250 7:26 AM July 28, 2016

2016-07-28 - Dulberg text to Baudin:

If they had a check it should have been entered into evidence by now. Since they don't too bad for them.

(847) 497-4250 7:28 AM July 28, 2016

2016-07-28 - Baudin text to Dulberg:

That would be a separate action. Nobody has even raised the issue of payment whether he's liable or not is

(815) 814-2193 7:29 AM July 28, 2016

2016-07-28 - Baudin text to Dulberg:

One issue. Whether or not there is coverage is a separate completely separate action that would be between ALLSTATE and him

(815) 814-2193 7:29 AM July 28, 2016

2016-07-28 - Dulberg text to Baudin:

Since when is it ok to entertain unsubstantiated claims this far along with no evidence any of it it remotely true

(847) 497-4250 7:30 AM July 28, 2016

2016-07-28 - Dulberg text to Baudin:

I just had to go back to carols dep. she claimed she gave money to David so he had something to claim on his taxes, not for the

work being performed. David claims an hourly wage and the father, Bill claimed Carol gave him a pair ago pants. Probably a gift as a thank you. None of these things are even close to being the same but all are suggestive and not proof of anything because their so vastly different

(847) 497-4250 7:42 AM July 28, 2016

2016-07-28 - Dulberg text to Baudin:

I am more curious who Carol hired to remove the tree and would be more interested questioning that company they were hired prior to the day of the incident. This would go a long way to putting David's claim of a contract to rest

(847) 497-4250 7:53 AM July 28, 2016

2016-07-28 - Baudin text to Dulberg:

It's not even a contract it was just an agreement that doesn't have to be something formal written it's like hey I'll pay you some money to take the tree

(815) 814-2193 7:57 AM July 28, 2016

2016-07-28 - Baudin text to Dulberg:

down. Headed into a meeting. I'll keep you up-to-date on any new information

(815) 814-2193 7:57 AM July 28, 2016

2016-07-28 - Dulberg text to Baudin:

If Carol, as she claimed, had previously entered into a contract with a real professional tree removal company why would she also agree to pay her son to remove the same tree? Unless, this is some sort of afterthought in an attempt to find ways of not paying for the damage they caused. They cannot play both sides of the street at the same time. They lied about this just as they lied about other things that happened that day all attempts to lessen the amount of damage done to me and lessen their responsibilities and misdirect blame and responsibility

(847) 497-4250 8:25 AM July 28, 2016

2016-07-28 - Dulberg text to Baudin:

The patterns are obvious and easily proven to be lies

(847) 497-4250 8:26 AM July 28, 2016

2016-07-28 - Dulberg text to Baudin:

From Carol knowing what I said in my Deposition, claiming the hospital and doctors gave her my personal medical information to the claims that she entered into some sort of verbal agreement with her son for business purposes sounds more like insurance company lawyers entering into an verbal agreement with their clients to skew the truth so they have some sort of out in exchange for representation in court.

(847) 497-4250 9:37 AM July 28, 2016

2016-07-28 - Dulberg text to Baudin:

If that's the case almost any claim made against an insurance policy can be thrown out based on verbal agreements with no proof to back up the story or lies being told

(847) 497-4250 9:40 AM July 28, 2016

2016-07-28 - Dulberg text to Baudin:

I see this a a malicious attempt to get away with little or or no consequences and just makes me want to expose all of this to a jury even more

(847) 497-4250 9:42 AM July 28, 2016

2016-07-29 - Dulberg text to Baudin:

Any chance Myrna can send me that asset report today? Also, there may be another asset that won't show up on his report. Rumor has it that David Gagnon had an auto accident and had to undergo some sort of surgery on his back and is in the process of suing for his injury.

(847) 497-4250 9:17 AM July 29, 2016

2016-08-02 - Dulberg text to Baudin:

What is a bad faith letter?

(847) 497-4250 3:47 PM August 2, 2016

2016-08-02 - Dulberg text to Baudin:

Has one been sent to the Allstate adjusters?

(847) 497-4250 5:30 PM August 2, 2016

2016-08-08 - Dulberg text to Baudin:

What is happening this Wednesday in court now that Allstate is getting their independent medical exam in September or October?

(847) 497-4250 8:29 AM August 8, 2016

2016-08-09 - Dulberg text to Baudin:

Do you want me at the courthouse tomorrow?

(847) 497-4250 11:20 AM August 9, 2016

2016-08-12 - Dulberg text to Baudin:

Morning Randy, Ok, it's driving me bananas over here, I'd like to know exactly what it is about the medical that's the issue in my case? Please call me with the details soon and let's discuss what's best. Thanks, Paul

(847) 497-4250 9:22 AM August 12, 2016

2016-08-16 - Dulberg text to Baudin:

Randy, I have to ask again, why is it wise to agree to mediate before permanent disability is determined by social security since the

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

(847) 497-4250 7:42 AM August 16, 2016

2016-10-18 - Dulberg text to Baudin:

Hi Randy, since we haven't received the IME report in 10 days as the Dr stated we would, I'd like to move back the date of the mediation thingy I'm being forced into so we have more than only a few weeks to deal with whatever the report may show. At least 2-3 months should do it considering the defense has already had the treating Dr's reports and depositions for months and years already. Let me know

(847) 497-4250 10:50 AM October 18, 2016

2016-10-18 - Dulberg text to Baudin:

Call me Thx, Paul

(847) 497-4250 10:52 AM October 18, 2016

2016-10-21 - Dulberg text to Baudin:

Hi Randy, looks like that board certified dr is quite the fabricator. He Should have a degree in creative writing rather than Dr.ing. Wish we had videotaped that because I'd post the video on the web right along side his report and let his patients see what he really is

(847) 497-4250 1:47 PM October 21, 2016

2016-10-21 - Dulberg text to Baudin:

Myrna said your forwarding the report to dr Kujawa. That's good but I don't think we need it to prove Phillips an outright liar who can't pay attention to details. Hmmm... Makes me wonder who the hell passed him in med school

(847) 497-4250 1:54 PM October 21, 2016

2016-10-21 - Dulberg text to Baudin:

Where did he come up with that line that the branch was still attached to the tree?

(847) 497-4250 1:58 PM October 21, 2016

2016-10-21 - Dulberg text to Baudin:

That's not from anyone's deposition and you were there so you know I gave absolutely no details other than to say that basically a man walked over and used a chainsaw on me.

(847) 497-4250 2:02 PM October 21, 2016

2016-10-21 - Dulberg text to Baudin:

He has quite the imagination claiming I said any of the crap in his report

(847) 497-4250 2:03 PM October 21, 2016

2016-10-21 - Dulberg text to Baudin:

I have to look up what board certified Phillips because they deserve to know what a liar this guy is.

(847) 497-4250 2:05 PM October 21, 2016

2016-10-21 - Dulberg text to Baudin:

Ok enough ranting for now. Let's get together and go over this report

(847) 497-4250 2:06 PM October 21, 2016

2016-10-21 - Dulberg text to Baudin:

While the memories are still fresh

(847) 497-4250 2:08 PM October 21, 2016

2016-10-21 - Dulberg text to Baudin:

Why write a history at all if it's all fabricated? Why say I told him stuff when I did not? Why Lie? This is about as unprofessional as it gets. Phillips should be made an example of. Sure you don't want the chance to cross examine this guy? I sure do

(847) 497-4250 2:15 PM October 21, 2016

2016-12-21 - Dulberg text to Baudin:

Myrna says I'm to meet you in McHenry, when and where?

(847) 497-4250 11:14 AM December 21, 2016

2016-12-21 - Baudin text to Dulberg:

I'm just heading to Panera to meet with a client on the route 31. You're welcome to come in anytime and I can tell the gentleman I have to run out to the

(815) 814-2193 11:16 AM December 21, 2016

2016-12-21 - Baudin text to Dulberg:

car and have you sign something I can meet you too at your car so come at your leisure I should be here for at least A half hour

(815) 814-2193 11:16 AM December 21, 2016

2016-12-21 - Dulberg text to Baudin:

Ok

(847) 497-4250 11:18 AM December 21, 2016

2016-12-21 - Dulberg text to Baudin:

Will be there in approx 15 min

(847) 497-4250 11:20 AM December 21, 2016

2016-12-21 - Dulberg text to Baudin:

You he Really?

(847) 497-4250 11:39 AM December 21, 2016

2016-12-21 - Dulberg text to Baudin:

You here?

(847) 497-4250 11:39 AM December 21, 2016

2016-12-21 - Baudin text to Dulberg:

Here

(815) 814-2193 11:41 AM December 21, 2016

2016-12-21 - Dulberg text to Baudin:

Why would Allstate need a signed release when they agreed to let the arbitrator decide what is final and not this afterthought of an agreement?

(847) 497-4250 1:02 PM December 21, 2016

2016-12-21 - Dulberg text to Baudin:

Or I mean release?

(847) 497-4250 1:02 PM December 21, 2016

2016-12-21 - Dulberg text to Baudin:

The arbitrator did not set these terms. Why are they modifying our original agreement

(847) 497-4250 1:04 PM December 21, 2016

2016-12-21 - Baudin text to Dulberg:

That's just typically what they do is have the release even though there's an award. I have a call into Gooch he's in depositions

(815) 814-2193 1:04 PM December 21, 2016

2016-12-21 - Dulberg text to Baudin:

Ok, but don't send in that document till we get this worked out. As of now I'm withdrawing my signature till we have something that works.

(847) 497-4250 1:06 PM December 21, 2016

2016-12-21 - Baudin text to Dulberg:

If I get the go ahead from Tom, we should be fine, is the one handling that case. I think it has no effect, but he's the one prosecuting the other case w

(815) 814-2193 1:08 PM December 21, 2016

2016-12-21 - Baudin text to Dulberg:

hile wait to hear what he says

(815) 814-2193 1:08 PM December 21, 2016

2016-12-21 - Dulberg text to Baudin:

Allstate has no business extending letting their client off to letting everyone off. What if I find out one of the surgeons left something inside me? This should just release the policy they represented at the ADR. Nothing more

(847) 497-4250 1:10 PM December 21, 2016

2016-12-21 - Baudin text to Dulberg:

It's boiler plate, fill in the blank language. They didn't write this specifically for you it's just what they use in all cases

(815) 814-2193 1:12 PM December 21, 2016

2016-12-21 - Dulberg text to Baudin:

Anyone agreeing to their fill in the blank form after the ADR agreement is nuts. I expect them to fulfill their ADR agreement with or without this release

(847) 497-4250 1:14 PM December 21, 2016

2016-12-21 - Dulberg text to Baudin:

If they wanted this as part of the agreement it should have been done prior to the binding ADR mediation

(847) 497-4250 1:15 PM December 21, 2016

2016-12-22 - Dulberg text to Baudin:

Morning Randy, I'll be at your office to sign the release sometime between 9-10 am. Wish you could just add the changes Thomas gooch suggested and save the trip but I'll show up just to put my initials on it.

(847) 497-4250 7:17 AM December 22, 2016

2016-12-22 - Baudin text to Dulberg:

I will be stuck in court Myrna has a release

(815) 814-2193 8:57 AM December 22, 2016

2017-11-07 - Dulberg text to Baudin:

hi Randy, its Paul Dulberg, just recieved a call from Randy Sr. Please call me. Thanks, Paul

(847) 497-4250 5:25 PM November 7, 2017

2017-11-07 - Baudin text to Dulberg:

My phone is dying I can I try you tomorrow?

(815) 814-2193 5:48 PM November 7, 2017

2017-11-07 - Baudin text to Dulberg:

What did he want?

(815) 814-2193 5:48 PM November 7, 2017

END