

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

PAUL R. DULBERG, INDIVIDUALLY)
AND THE PAUL R. DULBERG)
REVOCABLE TRUST)

Plaintiffs,)

vs.)

KELLY N. BAUDIN A/K/A BAUDIN)
& BAUDIN, BAUDIN & BAUDIN AN)
ASSOCIATION OF ATTORNEYS, LAW)
OFFICES OF BAUDIN & BAUDIN, BAUDIN)
& BAUDIN LAW OFFICES, WILLIAM)
RANDAL BAUDIN II A/K/A BAUDIN)
& BAUDIN, BAUDIN & BAUDIN AN)
ASSOCIATION OF ATTORNEYS, LAW)
OFFICES OF BAUDIN & BAUDIN, BAUDIN)
& BAUDIN LAW OFFICES, KELRAN, INC)
A/K/A THE BAUDIN LAW GROUP, Ltd.,)
JOSEPH DAVID OLSEN, A/K/A YALDEN,)
OLSEN & WILLETTE LAW OFFICES,)
CRAIG A WILLETTE, A/K/A YALDEN,)
OLSEN & WILLETTE LAW OFFICES,)
RAPHAEL E YALDEN II, A/K/A YALDEN,)
OLSEN & WILLETTE LAW OFFICES, ADR)
SYSTEMS OF AMERICA, LLC., ASSUMED)
NAME ADR COMMERCIAL SERVICES,)
ALLSTATE PROPERTY AND CASULTY)
INSURANCE COMPANY)

Defendants,)

CASE NO. 2022L010905

FILED DATE: 9/16/2024 1:06 PM 2022L010905

**PLAINTIFFS' MOTION FOR LEAVE TO FILE AN AMENDED COMBINED
MOTIONS AND REQUESTS**

Plaintiffs, PAUL R. DULBERG, INDIVIDUALLY AND THE PAUL R. DULBERG REVOCABLE TRUST, pro se, hereby moves the Court for an Order granting Plaintiffs' leave to file an amended combined motions and requests originally filed on July 15, 2024. In support of their Motion, the movants further state as follows:

1. On July 15, 2024, Plaintiffs filed combined motions and requests with active hyperlinks to the exhibits.
2. The clerk's file stamped copy of Plaintiffs' combined motions and requests contains disabled hyperlinks to the exhibits.
3. On July 16, 2024 a zoom hearing took place.
4. On August 28, 2024 a court order for a continuance to October 31, 2024 was filed.
5. It was on August 28, 2024 that Plaintiffs first noticed that all the hyperlinks contained in the combined motions and requests were disabled in the document stamped by the clerks office filed on July 15, 2024.
6. On August 30, 2024 Thomas Kost's father and Paul Dulberg's step father Richard Kost entered the emergency department.
7. On September 2, 2024, Richard Kost entered hospice care.
8. On September 8, 2024 Richard Kost died.
9. Without the hyperlinked exhibits being active the Court is unable to see or review any of the exhibits referenced in Plaintiffs' original combined motions and requests. This would render the Court blind to Plaintiffs' intended exhibits.

WHEREFORE, the Plaintiffs, PAUL R. DULBERG, INDIVIDUALLY AND THE PAUL R. DULBERG REVOCABLE TRUST, pray that the Court enter an Order granting the Plaintiffs' motion for leave to file an amended combined motions and requests adding a copy and paste-able typed hyperlink to each exhibit giving the Court the ability to see and review Plaintiffs' intended exhibits. A copy of the proposed Amended Combined Motions and Requests is attached to this motion as Exhibit A.

Respectfully submitted, this 16th day of September 2024

By: /s/ Paul R. Dulberg

Paul R. Dulberg
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McHenry, Illinois 60051
(847) 497-4250
Paul_Dulberg@comcast.net

Pro se for Plaintiffs: Plaintiffs PAUL R. DULBERG, INDIVIDUALLY AND THE PAUL R. DULBERG REVOCABLE TRUST

VERIFICATION BY CERTIFICATION PURSUANT TO SECTION 1-109

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

/s/ Paul R. Dulberg
Paul R. Dulberg

EXHIBIT A

- AMENDED COMBINED MOTIONS AND REQUESTS -

REQUEST FOR A COURT ORDERED EXCEPTION TO THE STANDING ORDER CONCERNING ILLINOIS CRS EMPLOYEES NOT BEING ALLOWED TO CONDUCT THE COURT REPORTING IN THIS COURT

MOTION TO STRIKE FROM THE RECORD TALARICO'S RESPONSE "PLAINTIFFS' RESPONSE TO DEFENDANT ADR SYSTEMS OF AMERICA, LLC'S RULE 137 MOTION FOR SANCTIONS" - FILED ON FEBRUARY 8, 2024

MOTION TO COMPEL TALARICO TO HAND OVER ALL PLAINTIFF'S CASE FILES, WORK PRODUCT AND COMMUNICATIONS RECORDS, ETC TO PLAINTIFF,

REQUEST FOR LEAVE SO PLAINTIFF MAY SUBMIT A NEW RESPONSE 28 DAYS AFTER TALARICO HANDS OVER ALL PLAINTIFF'S CASE FILES, WORK PRODUCT, ALL COMMUNICATIONS RECORDS, PAYMENT RECORDS, ETC TO PLAINTIFF,

REQUEST TO INCORPORATE ALL FILED ARDC COMPLAINTS RELATED TO THIS 137 SANCTION PETITION BE ENTERED IN THE RECORD.

LEAVE TO PURSUE DISCOVERY

NOW COMES the Plaintiffs PAUL R. DULBERG AND THE PAUL R. DULBERG REVOCABLE TRUST pro se, on their COMBINED MOTIONS states as follows:

REQUEST FOR A COURT ORDERED EXCEPTION TO THE STANDING ORDER /RULE CONCERNING THE OFFICIAL COURT REPORTERS OFFICE NOT BEING ALLOWED TO CONDUCT THE COURT REPORTING IN THIS COURT

1. We ask the court to make an exception by ORDER in this case and allow the Office of Official Court Reporters to replace the requirement of hiring private court reporters for the following reasons.

- a. On June 19, 2000 the Office of Official Court Reporters ceased covering the Law Division.
- b. Plaintiff is a pro se litigant.
- c. All private court reporters and private court reporting agencies plaintiff has contacted refuse to work for pro se litigants.
- d. Plaintiff is at a serious disadvantage and cannot obtain an accurate record without a

court reporter.

2. We ask that the court communicate the ORDER to the Office of Official Court Reporters and ensure that the Office of Official Court Reporters is present at each and every court date in this case before proceeding.

**MOTION TO STRIKE FROM THE RECORD TALARICO'S RESPONSE
"PLAINTIFFS' RESPONSE TO DEFENDANT ADR SYSTEMS OF AMERICA,
LLC'S RULE 137 MOTION FOR SANCTIONS" - FILED ON FEBRUARY 8, 2024**

3. We ask the court to strike "PLAINTIFFS' RESPONSE TO DEFENDANT ADR SYSTEMS OF AMERICA, LLC'S" RULE 137 MOTION FOR SANCTIONS" from the record for the following reasons.

4. Talarico abruptly resigned as counsel on January 14, 2024 under suspicious circumstances.

(Exhibit A)

5. Talarico wrote the motion and submitted it to the court on February 8, 2024.

6. Talarico was not retained by us when he wrote the response.

7. Talarico does not represent us and Talarico is hostile to our interests.

8. Evidence has emerged that Talarico has been willfully and wantonly setting us up for this Rule 137 sanction since before the complaint was filed in 22L010905 on December 8, 2022.

9. We submitted an ARDC complaint against Talarico on January 22, 2024, and have updated the complaint many times since then. **(Exhibit B)**

10. Evidence has emerged that Talarico has engaged in willful and wanton prima facie negligent conduct many times and that Talarico was working in coordination with at least 1 opposing party (Baudins) and a second opposing party (Allstate) and therefore most likely others in 22L010905.

(Exhibit C)

11. Evidence has emerged that Talarico was also setting us up in related case 17LA377 since at least July 11, 2022. **(Exhibit D)**

12. On June 7, 2024 Wm Randall Baudin submitted a response to an ARDC complaint that we filed against Wm Randall Baudin and Kelly Baudin. In the 7 page response Wm Randall Baudin

willfully and wantonly and intentionally misinformed the ARDC (and the Illinois Supreme Court) of at least 7 different features of Federal Bankruptcy case 14-83578 where the Baudins served as the special counsel for the bankruptcy estate. **(Exhibit E)**

13. All 7 features of which Wm Randall Baudin intentionally misinformed the ARDC and the Illinois Supreme Court on June 7, 2024 were included in the text file we provided to Talarico before December 6, 2022, yet Talarico (or third parties helping him) removed all 7 features from the text file provided to him and filed the complaint in 22L010905 on December 8, 2022 with all 7 features removed or manipulated. **(Exhibit F)**

14. Evidence has emerged that Talarico has engaged in willful and wanton prima facie negligent conduct in related case 17LA377 since at least July 11, 2022. **(Exhibit D)**

15. The Talarico fees and costs table prepared by us shows that Talarico left Dulberg heavily in debt intentionally. **(Exhibit G)**

16. Talarico then inexplicably misrepresented Dulberg as “well-heeled” in his response to the ARDC. **(Exhibit H)**.

17. From December 6 to December 8, 2022, Talarico willfully and wantonly edited (or allowed outside parties to edit) the body of the complaint we wrote in order to remove key information and to sabotage Dulberg’s claims. Talarico then submitted the complaint on December 8, 2022. **(Exhibit I)**

18. Since December 8, 2022 Talarico has also engaged in the following actions to further set Dulberg up for 137 sanctions:

- a.** As early as June 24, 2022 Talarico was provided with an ADR Systems Amended Complaint draft which Talarico never filed with court **(Exhibit J)**
- b.** On September 21, 2023 Talarico stated to presiding Judge “You let everyone go” when asked by the Judge if there were any more defendants remaining in 22L010905. Talarico admitted to Dulberg that he misspoke after the hearing the same day, but Talarico never corrected the court record. **(Exhibit K)**
- c.** On October 10, 2022 Talarico expressed uncertainty of the 22L010905 court status and appeal status. **(Exhibit L)**
- d.** On October 11, 2022 Talarico once again expressed uncertainty of the 22L010905 court status and appeal status. Talarico wrote in an email that he misspoke on

September 21, 2023 to Judge Otto but Talarico never acted to correct the court record. **(Exhibit M)**

- e. On October 31, 2023 Talarico told Dulberg not to attend the hearing scheduled that day in 22L010905 before Judge Otto. Neither Dulberg nor Talarico attended the hearing. The reasons Talarico gave Dulberg are stated in this email **(Exhibit N)**. No transcript of the hearing exists.
- f. On December 6, 2023 Talarico appeared before Judge Otto to schedule the sanctions hearing and dates briefs are due. They did not discuss Talarico's absence from the 10-31-2023 hearing. Talarico never gave a reason why he did not attend the 10-31-2023 hearing to Judge Otto. Judge Otto never asked for one. **(Exhibit O)**

19. Talarico refused to provide us with our case files after he abruptly resigned on January 14, 2024 even though we have requested that he provide us with the case files many times.

20. In Talarico's response to the ARDC, Talarico informed the ARDC he was retained to represent Dulberg in 17LA377 and 22L010905. Talarico omitted the fact that Talarico was retained to pursue at least 3 other lawsuits. Talarico hid this fact from the ARDC. **(Exhibit H)**

21. Our response to Talarico's ARDC response was provided to the ARDC as a series of 10 videos. **(Exhibit P)**

22. For the many reasons stated here and contained on our ARDC complaint and our ARDC reply to Talarico's response to the ARDC we ask for the court to strike **"PLAINTIFFS' RESPONSE TO DEFENDANT ADR SYSTEMS OF AMERICA, LLC'S RULE 137 MOTION FOR SANCTIONS"** filed on February 8, 2024 from the record.

**MOTION TO COMPEL TALARICO TO PROVIDE US WITH OUR CASE FILES
AND FINANCIAL RECORDS OF HIS COSTS AND FEES**

23. We ask the court to compel Talarico to provide us with our case files and financial records for the following reasons.

24. Talarico abruptly resigned as counsel on January 14, 2024. **(Exhibit A)**

25. We have a legitimate right to our case files and Talarico was paid for all services.

26. Talarico has refused to provide us with any of the at least 6 case files Talarico possesses.

27. There is a valid reason to suspect that Talarico is withholding our case files because the case

files will provide further proof that Talarico was working in collaboration with at least 1 opposing party when editing the complaint between December 6, 2022 and December 8, 2022 and when litigating case 22L010905.

28. Talarico has refused to provide us with any communications records that Talarico has with anyone with whom Talarico communicated on behalf of his clients Dulberg and Kost.

29. There is a valid reason to suspect that Talarico is withholding all communications records of conversations Talarico had on behalf of his clients Dulberg and Kost because the case files will provide further proof that Talarico was working in collaboration with at least 1 opposing party when editing the complaint between December 6, 2022 and December 8, 2022 and when litigating case 22L010905.

30. Talarico informed us that he would provide us with financial accounting of how the retainer was used and of costs and fees on April 12, 2024. Talarico has never provided us with any financial accounting records. **(Exhibit Q)**

31. There is a valid reason to suspect that Talarico is withholding all financial records from Dulberg and Kost because the financial records will provide further proof Talarico committed willful and wanton prima facie legal malpractice for a large financial gain.

32. For these reasons and the reasons stated in our ARDC complaint against Talarico and our ARDC reply to Talarico's ARDC response, we ask the court to compel Talarico to give all our case files to us in a complete form.

LEAVE TO REFILE "PLAINTIFFS' RESPONSE TO DEFENDANT ADR SYSTEMS OF AMERICA, LLC'S RULE 137 MOTION FOR SANCTIONS"

33. We ask the court leave to refile a response to "ADR SYSTEMS OF AMERICA, LLC'S PETITION FOR SANCTIONS UNDER RULE 137" once we have our case files from Talarico. We ask the court for at least 28 days once our case files are received from Talarico.

MOTION TO ENTER INTO RECORD

34. We ask that all filed ARDC complaints related to this Petition be entered into the record.

35. We ask that the Federal Court decision and sealed medical records on Dulberg's permanent disability be entered into the record. Talarico and Dulberg hired a courier service on August 29, 2023 to deliver the Federal Court decision and sealed medical records to Judge Otto but there is no record of this because Talarico "forgot" to have a court reporter present that day. We believe there are valid reasons to suspect that Talarico willfully, wantonly and intentionally arranged to have no court reporter present at the August 29, 2023 hearing for Summary Judgment.

LEAVE TO PURSUE DISCOVERY

36. We ask leave to be granted discovery and the Court issue a subpoena for an unredacted and complete record of recorded telephone conversations between Talarico and Dulberg and Talarico and Thomas Kost and between Talarico and all third parties and opposing counsel performed while representing his clients.

37. In Talarico's response to the ARDC (**Exhibit H**) Talarico made a number of inexplicably bizarre statement like

- a. "He often remarked to Mr. Talarico while litigating his numerous cases, that he will bringdown the entire justice system in Illinois and that he and Mr. Talarico will make much money for the movie rights."
- b. "That they wanted a morning meeting to discuss status of all matters starting at 8:00 AM daily (including weekends);"
- c. "That Mr. Talarico would ignore ARDC Claimant Mr. Dulberg's "gaslighting" and do what Mr. Kost recommended that he does-he hangs up the phone when Mr. Dulberg gets abusive with him, based on the fact that Mr. Dulberg forgets his medications on occasion."

38. But the phone record of Thomas Kost shows a total of 15 calls spread out over close to 3 years. (**Exhibit R**)

39. Talarico simply lied with impunity to the ARDC and Illinois Supreme Court when making these statements and others.

40. There is a valid reason to suspect that Talarico is withholding his communication with other

parties on our behalf because the communications records will provide further proof Talarico was working in collaboration with at least 1 opposing party when editing the complaint and when litigating case 22L010905.

41. We are certain that the unredacted and complete record of recorded telephone conversations between Talarico and Dulberg and Talarico and Thomas Kost will provide clear and convincing evidence that Talarico repeatedly committed willful and wanton prima facie legal malpractice many times when editing the complaint filed on December 8, 2022.

42. We are certain that the unredacted and complete record of recorded telephone conversations between Talarico and Dulberg and Talarico and Thomas Kost will provide clear and convincing evidence that Talarico repeatedly engage in willful and wanton prima facie negligent conduct throughout his representation of Dulberg and the Paul R. Dulberg Revocable Trust in 22L010905.

43. We are certain that the unredacted and complete record of recorded telephone conversations between Talarico and Dulberg and Talarico and Thomas Kost will provide clear and convincing evidence that Talarico repeatedly engaged in willful and wanton prima facie negligent conduct throughout his representation of Dulberg in related case 17LA377.

44. For these reasons we ask the court to grant discovery to Dulberg to obtain telephone recordings of all telephone conversations Talarico had with his clients Dulberg and Kost and with anyone else on behalf of his clients while working on the client's cases.

45. For reasons stated in this combined motion we ask the Court to grant discovery and the Court to issue subpoenas on all opposing parties for a complete record of communication between them and Talarico and any other discovery that helps prove who is responsible for any actions that may result in 137 sanctions.

**LEAVE FOR THE TRUSTEE OF THE PAUL R DULBERG REVOCABLE TRUST
TO SEEK COUNSEL**

46. The trustee of the Paul R. Dulberg Revocable Trust, Thomas Kost, has reached out to over one hundred law firms in Illinois to attempt to retain counsel for Dulberg and for the Paul R. Dulberg Revocable Trust, but has been unable as yet to find an Illinois attorney to represent

the Paul R. Dulberg Revocable Trust or Paul Dulberg. It is more likely than not this is because Talarico has left Dulberg's remaining claims in such a damaged and confused state and because Talarico (and others) have willfully and wantonly created such a toxic environment around case 22L010905 that many Illinois attorneys would not want to be involved in such a complex case that involves so many ARDC complaints against so many fellow Illinois attorneys. What should have been a more straightforward case of willful and wanton prima facie negligent misconduct filed against the Baudins and Bankruptcy trustee Joseph Olsen in Federal Bankruptcy Court was intentionally turned into a toxic mess by Talarico.

47. For these reasons we ask for an extension of time in order to find an attorney that can appear for the Paul R. Dulberg Revocable Trust in at least a limited capacity.

WHEREFORE, Plaintiffs PAUL R. DULBERG, INDIVIDUALLY AND THE PAUL R. DULBERG REVOCABLE TRUST pray that this Court enter ORDERs granting these combined motions and requests and grant such other relief as this Court deems just and proper.

Respectfully submitted, this 16th day of September 2024

By: /s/ Paul R. Dulberg
Paul R. Dulberg

4606 Hayden Ct. McHenry, Illinois 60051 (847) 497-4250 Paul_Dulberg@comcast.net

Pro se for Plaintiffs: Plaintiffs PAUL R. DULBERG, INDIVIDUALLY AND THE PAUL R. DULBERG REVOCABLE TRUST

VERIFICATION BY CERTIFICATION PURSUANT TO SECTION 1-109

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

/s/ Paul R. Dulberg
Paul R. Dulberg

EXHIBITS

All Exhibits are publicly available online

Exhibit A: Talarico resigned on January 14, 2024.

May be viewed by copying and pasting the following into any web browser:

http://www.fraudonthecourt.net/exhibits/Group%20Exhibit%2050_Dulberg-Talarico%20communication%20from%20October,%202020%20onward/2024-01-14_Gmail%20-%20In%20the%20spirit%20of%20openness%20and%20honesty.pdf

Exhibit B: ARDC complaint against Talarico consists of [3 series of videos](http://www.fraudonthecourt.net/video/) at <http://www.fraudonthecourt.net/video/>

First series ‘Being targeted by an attorney network’ 1 to 14 may be viewed by copying and pasting the following into any web browser:

<http://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%201-%20Targeted%20by%20ones%20own%20retained%20attorneys.mp4>

<http://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%202-%20The%20network%20and%20the%20system.mp4>

<http://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%203-%20Legal%20malpractice%20system%20of%20protection.mp4>

<http://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%204-%20Simplest%20way%20to%20sabotage%20targets%20legal%20malpractice%20complaints.mp4>

<http://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%205-%20Networks%20of%20collaborating%20attorneys%20can%20be%20mapped.mp4>

<http://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%206-%20The%20escape%20hatch%20and%20cover%20stories.mp4>

<http://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%207-%20A%20system%20of%20suppression.mp4>

<http://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%208-%20Targeting%20emails.mp4>

<http://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%209-%20Burial%20of%20key%20evidence.mp4>

<http://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%2010-%20Reverse%20engineering%20the%20system%20of%20suppression.mp4>

<http://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%2011-%20How%20the%20target%20receives%20Bates%20numbered%20documents.mp4>

<http://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%2012-%20Decoys%20to%20lock%20out%20key%20evidence%20and%20finish%20the%20victim%20off.mp4>

<http://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%2013-%20Hoarding%20and%20sitting%20on%20key%20evidence%20and%20evidence%20of%20fraud.mp4>

<http://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%2014-%20The%20legal%20malpractice%20team%20targeting%20a%20client.mp4>

Second series ‘The revenge of the network’ 1 to 11 may be viewed by copying and pasting the following into any web browser:

<http://www.fraudonthecourt.net/video/The%20revenge%20of%20the%20network%201-%20Simplest%20>

frivolous%20lawsuit%20template.mp4

<http://www.fraudonthecourt.net/video/The%20revenge%20of%20the%20network%202-%20Setting%20the%20target%20up%20for%20sanctions%20and%20loss%20of%20home%20using%20frivolous%20lawsuit%20templates.mp4>

<http://www.fraudonthecourt.net/video/The%20revenge%20of%20the%20network%203-%20Trapping%20target%20in%20single%20issue%20frivolous%20lawsuit%20dead%20end%20pathways%20as%20they%20desparately%20struggle%20to%20escape.mp4>

<http://www.fraudonthecourt.net/video/The%20revenge%20of%20the%20network%204-%20Stripping%20claims%20against%20Baudins%20and%20Olsen%20using%20No%20Past%20No%20Future%20and%20Burial%20of%20troublesome%20issues.mp4>

<http://www.fraudonthecourt.net/video/The%20revenge%20of%20the%20network%205-%20Why%20reverse%20engineering%20to%20pathway%20point%20of%20origin%20is%20essential.mp4>

<http://www.fraudonthecourt.net/video/The%20revenge%20of%20the%20network%206-%20Talaricos%20Grand%20finale%20of%20sabotages.mp4>

<http://www.fraudonthecourt.net/video/The%20revenge%20of%20the%20network%207-%20Discovery%20of%20forgeries%20and%20Judge-defendant%20friendship.mp4>

<http://www.fraudonthecourt.net/video/The%20revenge%20of%20the%20network%208-%20Upstream,%20downstream%20and%20parallel%20sabotages.mp4>

<http://www.fraudonthecourt.net/video/The%20revenge%20of%20the%20network%209-%20Downstream%20ambush%20and%20sabotage%20on%20ADR%20Systems%20pathway.mp4>

<http://www.fraudonthecourt.net/video/The%20revenge%20of%20the%20network%2010-%20The%20many%20ways%20we%20tried%20to%20raise%20issues%20of%20forgery%20and%20fraud%20on%20all%20pathways.mp4>

<http://www.fraudonthecourt.net/video/The%20revenge%20of%20the%20network%2011-%20Multi-sabotage%20of%20all%20appeal%20pathways.mp4>

Third series ‘The steering of any appeal into a ditch’ 1 to 4 may be viewed by copying and pasting the following into any web browser:

<http://www.fraudonthecourt.net/video/The%20steering%20of%20any%20appeal%20into%20a%20ditch%201-%20Using%20unequal%20knowledge%20to%20quickly%20finish%20off%20permanently%20disabled%20target.mp4>

<http://www.fraudonthecourt.net/video/The%20steering%20of%20any%20appeal%20into%20a%20ditch%202-%20Setting%20up%20target%20to%20loose%20race%20against%20time.mp4>

<http://www.fraudonthecourt.net/video/The%20steering%20of%20any%20appeal%20into%20a%20ditch%203-%20Talarico%20becomes%20the%20new%20decoy%20to%20distract%20from%20the%20network%20and%20system.mp4>

<http://www.fraudonthecourt.net/video/The%20steering%20of%20any%20appeal%20into%20a%20ditch%204-%20Talarico%20Higher%20Court%20sabotage%20maps.mp4>

and 3 documents linked [here](#) and [here](#) and [here](#) may be viewed by copying and pasting the following into any web browser:

http://www.fraudonthecourt.net/ardc/2024-01-22_ARDC%20Complaint_ALPHONSE%20TALARICO%20Part%201.pdf

http://www.fraudonthecourt.net/ardc/2024-02-01_Supplement%20to%20ARDC%20Complaint_ALPHONSE%20TALARICO%20Part%201.pdf

http://www.fraudonthecourt.net/ardc/2024-02-13_Second%20Supplement%20to%20ARDC%20Complaint%20Against%20Alphonse%20Talarico,%20Part%201.pdf

Exhibit C: [See video series](#) 'Illinois response to being informed of attorney network' 24 to 27 submitted to the ARDC on July 2, 2024 may be viewed by copying and pasting the following into any web browser:

<https://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2024-%20%20Baudin%20ARDC%20response%20is%20intentionally%20engineered%20to%20deceive%20the%20reader.mp4>

<http://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2025-%20%20Baudins%20intentionally%20delete%20trustee%20Heeg%20and%20invent%20sole%20trustee%20Olsen.mp4>

<http://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2026-%207%20intentional%20deceptions%20the%20Baudins%20make%20to%20the%20Illinois%20Supreme%20Court.mp4>

<http://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2027-Evidence%20of%20collaboration%20between%20Talarico%20and%20Baudins%20to%20sabotage%20Dulbergs%20complaint%20filed%20on%2012-8-2022.mp4>

Exhibit D: [See video series](#) 'Being targeted by an attorney network' 1 to 14 may be viewed by copying and pasting the following into any web browser:

<http://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%201-%20Targeted%20by%20ones%20own%20retained%20attorneys.mp4>

<http://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%202-%20The%20network%20and%20the%20system.mp4>

<http://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%203-%20Legal%20malpractice%20system%20of%20protection.mp4>

<http://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%204-%20Simplest%20way%20to%20sabotage%20targets%20legal%20malpractice%20complaints.mp4>

<http://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%205-%20Networks%20of%20collaborating%20attorneys%20can%20be%20mapped.mp4>

<http://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%206-%20The%20escape%20hatch%20and%20cover%20stories.mp4>

<http://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%207-%20A%20system%20of%20suppression.mp4>

<http://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%208-%20Targeting%20emails.mp4>

<http://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%209-%20Burial%20of%20key%20evidence.mp4>

<http://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%2010-%20Reverse%20engineering%20the%20system%20of%20suppression.mp4>

<http://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%2011-%20How%20the%20target%20receives%20Bates%20numbered%20documents.mp4>

<http://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%2012-%20Decoys%20to%20lock%20out%20key%20evidence%20and%20finish%20the%20victim%20off.mp4>

<http://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%2013-%20Hoarding%20and%20sitting%20on%20key%20evidence%20and%20evidence%20of%20fraud.mp4>

<http://www.fraudonthecourt.net/video/Being%20targeted%20by%20an%20attorney%20network%2014-%20The%20legal%20malpractice%20team%20targeting%20a%20client.mp4>

[See video series](#) 'The steering of any appeal into a ditch' 1 to 4 may be viewed by copying and pasting the following into any web browser:

<http://www.fraudonthecourt.net/video/The%20steering%20of%20any%20appeal%20into%20a%20ditch%201-%20Using%20unequal%20knowledge%20to%20quickly%20finish%20off%20permanently%20disabled%20target.mp4>

<http://www.fraudonthecourt.net/video/The%20steering%20of%20any%20appeal%20into%20a%20ditch%202-%20Setting%20up%20target%20to%20lose%20race%20against%20time.mp4>

<http://www.fraudonthecourt.net/video/The%20steering%20of%20any%20appeal%20into%20a%20ditch%203-%20Talarico%20becomes%20the%20new%20decoy%20to%20distract%20from%20the%20network%20and%20system.mp4>

<http://www.fraudonthecourt.net/video/The%20steering%20of%20any%20appeal%20into%20a%20ditch%204-%20Talarico%20Higher%20Court%20sabotage%20maps.mp4>

Exhibit E: See video '[Illinois response to being informed of attorney network 27](#)' submitted to the ARDC on July 2, 2024 which may be viewed by copying and pasting the following into any web browser:

<http://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2027-Evidence%20of%20collaboration%20between%20Talarico%20and%20Baudins%20to%20sabotage%20Dulbergs%20complaint%20filed%20on%2012-8-2022.mp4>

See video series 'Illinois response to attorney network' 24 to 27 submitted to the ARDC on June 28, 2024 which may be viewed by copying and pasting the following into any web browser:

<http://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2024-%20%20Baudin%20ARDC%20response%20is%20intentionally%20engineered%20to%20deceive%20the%20reader.mp4>

<http://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2025-%20%20Baudins%20intentionally%20delete%20trustee%20Heeg%20and%20invent%20sole%20trustee%20Olsen.mp4>

<http://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2026-%207%20intentional%20deceptions%20the%20Baudins%20make%20to%20the%20Illinois%20Supreme%20Court.mp4>

<http://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2027-Evidence%20of%20collaboration%20between%20Talarico%20and%20Baudins%20to%20sabotage%20Dulbergs%20complaint%20filed%20on%2012-8-2022.mp4>

Exhibit F: See video '[The revenge of the network 4](#)' and video '[Illinois response to being informed of attorney network 27](#)' submitted to the ARDC on June 28, 2024 which may be viewed by copying and pasting the following into any web browser:

<http://www.fraudonthecourt.net/video/The%20revenge%20of%20the%20network%204-%20Stripping%20claims%20against%20Baudins%20and%20Olsen%20using%20No%20Past%20No%20Future%20and%20Burial%20of%20troublesome%20issues.mp4>

<http://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2027-Evidence%20of%20collaboration%20between%20Talarico%20and%20Baudins%20to%20sabotage%20Dulbergs%20complaint%20filed%20on%2012-8-2022.mp4>

Exhibit G: may be viewed by copying and pasting the following into any web browser:

http://www.fraudonthecourt.net/exhibits/Exhibit%20255_Table%20of%20costs%20and%20fees%20during%20Talarico%20Representation.pdf

Exhibit H: [Talarico's response to the ARDC](#). See video series 'Illinois response to being informed of attorney network' 14 to 23 for our ARDC reply to Talarico's response submitted to the ARDC on May 13, 2024 which may be viewed by copying and pasting the following into any web browser:

http://www.fraudonthecourt.net/ardc/2024-04-30_Talarico%20response%20to%20ARDC%20complaint.pdf

<http://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2014-%20Overview%20of%20Talarico%20response.mp4>

<http://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2015-%20The%20%20theories%20and%20writing%20your%20own%20passport.mp4>

<http://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2016-%20Using%20timelines%20and%20communications%20records%20to%20spot%20logical%20poverty.mp4>

<https://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2017-%20Theory%20%20word%20replacement%20and%20passports%20and%20a%20new%20emerging%20reality%20consensus.mp4>

<http://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2018-%20Using%20timelines%20and%20communications%20records%20to%20spot%20more%20logical%20poverty%20and%20the%20sadness%20of%20the%20system.mp4>

<http://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2019-%20Using%20timelines%20and%20communications%20records%20to%20spot%20more%20logical%20poverty.mp4>

<http://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2020-%20Its%20all%20in%20Dulbergs%20mind.mp4>

<http://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2021-%20Fact-find%20then%20flip%20into%20opposite%20then%20run.mp4>

<http://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2022-%20Talarico%20fees%20compared%20to%20Talarico%20work%20product.mp4>

<http://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2023-%20A%20clear%20explanation%20that%20anyone%20can%20understand.mp4>

Exhibit I: See video '[Illinois response to being informed of attorney network 27](#)' submitted to the ARDC on July 2, 2024 and may be viewed by copying and pasting the following into any web browser:

<http://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2027-Evidence%20of%20collaboration%20between%20Talarico%20and%20Baudins%20to%20sabotage%20Dulbergs%20complaint%20filed%20on%2012-8-2022.mp4>

Exhibit J: [email](#) and [draft ADR Systems Amended Complaint](#) provided to Talarico on June 24, 2023 may be viewed by copying and pasting the following into any web browser:

http://www.fraudonthecourt.net/exhibits/Group%20Exhibit%2050_Dulberg-Talarico%20communication%20from%20October,%202020%20onward/2023-06-24_0036-49__T%20Kost_%20_tkost999@gmail.com__Draft%20ADR%20Systems%20of%20America%20Amended%20Complaint.pdf

http://www.fraudonthecourt.net/exhibits/Group%20Exhibit%2050_Dulberg-Talarico%20communication%20from%20October,%202020%20onward/2023-06-24_email%20attachment-%20Draft%20ADR%20Systems%20Amended%20Complaint%20.pdf

Exhibit K: September 21, 2023 Report of Proceedings may be viewed by copying and pasting the following into any web browser:

[http://www.fraudonthecourt.net/exhibits/Group%20Exhibit%2057_Complete%20legal%20argument%20between%20Talarico%20and%20Allstate/2023-09-25_MyVeritext%20Batch%20Download%20-%206099461%20-%20Monday,%20September%2025,%202023%2012_20%20PM/6099461-1%20\(1\)_PDFTran.pdf](http://www.fraudonthecourt.net/exhibits/Group%20Exhibit%2057_Complete%20legal%20argument%20between%20Talarico%20and%20Allstate/2023-09-25_MyVeritext%20Batch%20Download%20-%206099461%20-%20Monday,%20September%2025,%202023%2012_20%20PM/6099461-1%20(1)_PDFTran.pdf)

Exhibit L: may be viewed by copying and pasting the following into any web browser:

http://www.fraudonthecourt.net/exhibits/Group%20Exhibit%2056_Complete%20legal%20argument%20between%20Talarico%20and%20ADR%20Systems/2023-10-11_1030-12__Alphonse%20Talarico_%20_contact@lawofficeofalphonsetalarico.com__Fw_%20Are%20these%204%20Illinois%20Circuit%20Court%20Orders%20Appealable%20_%20Does%20the_%20J.pdf

Exhibit M: may be viewed by copying and pasting the following into any web browser:

http://www.fraudonthecourt.net/exhibits/Group%20Exhibit%2056_Complete%20legal%20argument%20between%20Talarico%20and%20ADR%20Systems/2023-10-11_1030-12__Alphonse%20Talarico_%20_contact@lawofficeofalphonsetalarico.com__Fw_%20Are%20these%204%20Illinois%20Circuit%20Court%20Orders%20Appealable%20_%20Does%20the_%20J.pdf

Exhibit N: may be viewed by copying and pasting the following into any web browser:

http://www.fraudonthecourt.net/exhibits/Group%20Exhibit%2056_Complete%20legal%20argument%20between%20Talarico%20and%20ADR%20Systems/2023-10-31_1240-32__Paul%20Dulberg_%20Paul_Dulberg@comcast.net__Kangaroo%20court%20order%20issued%20today%20in%20Baudin,%20Olsen,%20ADR,%20Allstate_%20case.pdf

Exhibit O: On December 6, 2023 Talarico appeared before Judge Otto. [email](#) may be viewed by copying and pasting the following into any web browser:

http://www.fraudonthecourt.net/exhibits/Group%20Exhibit%2056_Complete%20legal%20argument%20between%20Talarico%20and%20ADR%20Systems/2023-12-06_0750-28__Paul%20Dulberg_%20_Paul_Dulberg@comcast.net__Baudin%20case%20court%20date%20tomorrow.pdf

Exhibit P: [See video series:](#) 'Illinois response to being informed of attorney network' 14 to 23 submitted to the ARDC on May 13, 2024 and may be viewed by copying and pasting the following into any web browser:

<http://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2014-%20Overview%20of%20Talarico%20response.mp4>

<http://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2015-%20The%20%20theories%20and%20writing%20your%20own%20passport.mp4>

<http://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2016-%20Using%20timelines%20and%20communications%20records%20to%20spot%20logical%20poverty.mp4>

<http://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2017-%20Theory%20%20word%20replacement%20and%20passports%20and%20a%20new%20emerging%20reality%20consensus.mp4>

<http://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2018-%20Using%20timelines%20and%20communications%20records%20to%20spot%20more%20logical%20poverty%20and%20the%20sadness%20of%20the%20system.mp4>

<http://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2019-%20Using%20timelines%20and%20communications%20records%20to%20spot%20more%20logical%20poverty.mp4>

<http://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2020-%20Its%20all%20in%20Dulbergs%20mind.mp4>

<http://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2021-%20Fact-find%20then%20flip%20into%20opposite%20then%20run.mp4>

<http://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2022-%20Talarico%20fees%20compared%20to%20Talarico%20work%20product.mp4>

<http://www.fraudonthecourt.net/video/Illinois%20response%20to%20being%20informed%20of%20attorney%20network%2023-%20A%20clear%20explanation%20that%20anyone%20can%20understand.mp4>

Exhibit Q: may be viewed by copying and pasting the following into any web browser:

http://www.fraudonthecourt.net/exhibits/Group%20Exhibit%2050_Dulberg-Talarico%20communication%20from%20October,%202020%20onward/2024-04-14_Gmail%20-%20Fwd%20Return%20of%20Case%20Files%20etc...%20Re%20Motions%20for%20Withdrawal%20of%20Representation.pdf

FILED DATE: 9/16/2024 1:06 PM 2022L010905

Exhibit R: may be viewed by copying and pasting the following into any web browser:

http://www.fraudonthecourt.net/exhibits/Exhibit%20256_Talarico-Kost%20phone%20record.pdf

NOTICE OF MOTION

To: Attached Service List

YOU ARE HEREBY notified that on the 23rd day of September, 2024, at 9:00 o'clock A.M., or soon thereafter as Counsel may be heard, I shall appear via zoom before his Honor, Judge Anthony Swanagan, in the room usually occupied by him as a Court Room, or in his absence, before any other Judge that may be presiding in said Court Room, in the Courthouse in Cook County at Chicago, Illinois, and then and there present: Plaintiffs' Motion for Leave to File an Amended Combined Motions and Requests; At which time and place you may appear, if you so desire.

Dated: September 16, 2013

By: /s/ Paul R. Dulberg
Paul R. Dulberg

4606 Hayden Ct. McHenry, Illinois 60051
(847) 497-4250
Paul_Dulberg@comcast.net

PAUL R. DULBERG, INDIVIDUALLY AND THE PAUL R. DULBERG REVOCABLE TRUST,
Plaintiffs, Pro Se.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing document was served upon:

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Other Service Contacts:

Paul_Dulberg@comcast.net

tkost999@gmail.com

by depositing the same online in the Illinois e-filing system, by 5:00 o'clock p.m. on September 16, 2024.

By: /s/ Paul R. Dulberg

Paul R. Dulberg

4606 Hayden Ct. McHenry, Illinois 60051

(847) 497-4250

Paul_Dulberg@comcast.net

Pro se for Plaintiffs: Plaintiffs PAUL R. DULBERG, INDIVIDUALLY AND THE PAUL R. DULBERG REVOCABLE TRUST