

**TABLE 2: STRATEGIES AND METHODS OF 5 LAW FIRMS RETAINED BY DULBERG**

ATTORNEY	STRATEGY	METHODS
<b>Popovich &amp; Mast</b> Personal Injury Case 12LA178	<b>Plaintiff's attorney intentionally weakens or sabotages plaintiff's case</b>	Destruction and concealment of evidence Forged signatures Staged depositions (depositions with no actual court reporter present) <b>Knew defendant Gagnon already admitted negligence for Dulberg's injury</b> Worked in violation of federal bankruptcy court automatic stay to force a settlement against client's wishes Represented a client when they knew client had no standing as plaintiff in court <b>Tried to put a cap of \$50,000 on the remaining case</b> (Described in detail in "Evidence of Fraud on the Court in 12LA178")
<b>Balke</b> Personal Injury Case 12LA178	<b>Plaintiff's attorney intentionally weakens or sabotages plaintiff's case</b>	<b>Knew defendant Gagnon already admitted negligence for Dulberg's injury</b> Worked in violation of federal bankruptcy court automatic stay to force a settlement against client's wishes Represented client when they knew client had no standing as plaintiff in court <b>Tried to put a cap of \$50,000 on the remaining case</b>
<b>The Baudins</b> Personal Injury Case 12LA178	<b>Plaintiff's attorney intentionally weakens or sabotages plaintiff's case</b>	Forgery <b>Knew defendant Gagnon already admitted negligence for Dulberg's injury</b> Worked in violation of federal bankruptcy court automatic stay to force a capped binding mediation agreement against client's wishes Represented client when they knew client had no standing as plaintiff in court <b>Placed a cap of \$300,000 on the remaining case</b>
<b>Gooch</b> Legal Malpractice Case 17LA377	<b>Plaintiff's attorney intentionally weakens or sabotages plaintiff's case</b>	Said he would file lawsuit in 7 days but actually filed more than 11 months later Gooch law office did not even scan client's files into digital form for 6 months <b>Knew defendant Gagnon already admitted negligence for Dulberg's injury</b> Suppression of information on bankruptcy, Baudin and Popovich negligence Filed 2 complaints which intentionally included a 'trap door' to allow defendants to get out of the case on 2-619 and 2-615 summary judgment (Described in detail in this document)
<b>Clinton &amp; Williams</b> Legal Malpractice Case 17LA377	<b>Plaintiff's attorney intentionally weakens or sabotages plaintiff's case</b>	Massive and sophisticated suppression of key evidence and information during pleadings and discovery document disclosure process <b>Knew defendant Gagnon already admitted negligence for Dulberg's injury</b> (Described in detailed in "Evidence of Fraud on the Court in 17LA377 During Clinton-Williams Representation")

1. All successive attorneys to the same (fully disabled) client used the same overall strategy: **To intentionally weaken or sabotage their own client's case**. All three personal injury attorneys retained by Dulberg **acted in violation of the automatic stay**. They continued to appear in the 22nd Judicial Circuit Court (which operated for approximately 25 months in violation of the automatic stay) claiming to represent Dulberg (who had no standing as plaintiff). All 3 PI attorneys made efforts to **place a cap on the remaining case without having any authority from the Bankruptcy Court to do so**. Both legal malpractice attorneys suppressed all information of how all 3 PI law firms **violated federal bankruptcy laws** from Dulberg and from the complaints.

2. All five law firms (3 personal injury law firms and 2 legal malpractice law firms) knew or could easily discover that the personal injury defendant (who was operating the chainsaw that

injured Dulberg) **Gagnon effectively admitted negligence for Dulberg's injury** as of early March, 2013. None of the 5 law firms ever informed Dulberg of this. The original defendant and operator of the chainsaw, Gagnon, admitted to being negligent:

About 10 months before Dulberg was coerced into settling with the owners of the property (the McGuires) on which the accident occurred and for whom Gagnon was working.

About 21 months before Dulberg declared bankruptcy.

About 39 months before any binding mediation agreement with Gagnon was mentioned.

About 40 months before any cap was placed on any binding mediation award from Gagnon.

3. There was no reason for any of these activities to take place if the defendant who operated the chainsaw already admitted to being negligent.

merely clarified and more specifically identified communications and documents which were the subject of prior discovery requests, and some of which were identified at Mr. Dulberg's discovery deposition taken on February 19, 2020. Please feel free to contact me if you would like to discuss this matter."

4. "Evidence of Fraud on the Court in 12LA178" details how Popovich and Mast:
  - a) Represented Dulberg in 22nd Judicial Circuit Court even though an automatic stay was in place.
  - b) Did not sign any agreement with the Bankruptcy trustee (who he knew has standing as plaintiff in the case once Dulberg declared bankruptcy)
  - c) Knew that Gagnon already effectively admitted to negligence for Dulberg's injury
  - d) Never insisted that Gagnon answer interrogatories
  - e) Tried to get Dulberg to agree to Allstate settlement for \$50,000 or less (while an automatic stay was in place)
5. After Popovich and Mast resigned Dulberg hired Brad Balke. Balke also:
  - a) Contracted with Dulberg even though he knew Dulberg had no standing as plaintiff in the case.
  - b) Agreed to take the case to trial when contracting.
  - c) Represented Dulberg in 22nd Judicial Circuit Court even though the automatic stay was in place.
  - d) Did not sign any agreement with Bankruptcy trustee. (who he knew had standing as plaintiff in the case)
  - e) Knew or should have known that Gagnon already effectively admitted to negligence

for Dulberg's injury.

- f) Tried to get Dulberg to agree to Allstate settlement for \$50,000 or less. (while an automatic stay was in place)

**6. After firing Balke, Dulberg hired the Baudins. The Baudins also:**

- a) Contracted with Dulberg even though they knew Dulberg had no standing as plaintiff in the case. (the third consecutive law firm to do so)
- b) Agreed to take the case to trial when contracting. (the third consecutive law firm to do so)
- c) Represented Dulberg in 22nd Judicial Circuit Court even though the automatic stay was in place (the third consecutive law firm to do so)
- d) Did not sign any agreement with Bankruptcy trustee who they knew had standing as plaintiff in the case from September 22, 2015 to October 31, 2016. (the third consecutive law firm to do so)
- e) Knew or should have known that Gagnon already effectively admitted to negligence for Dulberg's injury. (the third consecutive law firm to do so)
- f) Worked with Allstate to successfully place an 'upper cap' on the value of PI 12LA178. (while an automatic stay was in place)