

**IN THE CIRCUIT COURT OF THE TWENTY-SECOND
JUDICIAL CIRCUIT, McHENRY COUNTY, ILLINOIS**

PAUL R. DULBERG	)	
Plaintiff,	)	
v.	)	Case No. 2025LA000360
THOMAS W. GOOCH, et al.,	)	
Defendants.	)	

**PLAINTIFF’S MOTION FOR APPROVAL OF EXCESS LENGTH AND
CONSIDERATION OF PREVIOUSLY FILED FLYNN MOTION TO RECONSIDER**

NOW COMES Plaintiff, Paul R. Dulberg, pro se, and pursuant to Twenty-Second Judicial Circuit Local Rule 2.01(Q), requests approval of the 25-page length of his Flynn reconsideration motion already filed as Docket No. 0521, permission to have that motion considered in its entirety as filed, and relief from the requirement that approval have been obtained before filing. In support, Plaintiff states:

- 01.** The August 26, 2026 Order permitted Plaintiff to file a motion to reconsider the Flynn dismissal by September 4, 2026, and set Plaintiff’s motions to reconsider for argument on September 14, 2026, at 10:00 a.m. (August 26, 2026 Order, Dkt. 0516, p. 1, ¶ 2; p. 2, ¶ 10.)
- 02.** Plaintiff filed the “Plaintiff’s Motion to Reconsider the Rule 137 Liability Determination and, Alternatively, the With-Prejudice Scope of the Flynn Dismissal, and to Defer the Fee Petition,” Docket No. 0521. The Clerk’s filing stamp identifies September 4, 2026, at 11:52 p.m. as the filing date and time. (Dkt. 0521, p. 1.) The corresponding Notice of Motion and Notice of Hearing identifies the September 14, 2026, 10:00 a.m. setting. (Dkt. 0520, p. 1.)
- 03.** Docket No. 0521 contains 25 numbered pages, including its caption, requested relief, signature, limited verification, and certificate of service. It also contains seven attached/ embedded supporting exhibits: EV, EX, EY, EZ, FA-1, FA-2, and FA-3. Plaintiff requests approval of the full 25-page motion with those existing exhibits. The 25-page count does not include the pages within the attached/embedded exhibits. (Dkt. 0521, pp. 1–25 and attached/ embedded exhibits.)
- 04.** Local Rule 2.01(Q) requires prior approval for a motion exceeding 15 double-spaced pages. Plaintiff did not obtain separate approval of the excess length before filing. Plaintiff now requests

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that the Court excuse the absence of prior approval for this submission and approve its 25-page length before deciding whether to consider it.

05. Good cause supports consideration of the complete submission. The motion addresses the relationship between the pleaded conspiracy and the underlying record; the effect of the prior appeal's dismissal; the alternative request to amend; the separate procedural and substantive grounds for Rule 137 liability; Plaintiff's prefiling inquiry and purpose; and the requested deferral of Flynn's fee petition. Those issues require discussion of the original pleading, interrelated proceedings, source exhibits, and the different standards governing dismissal and sanctions. The motion supplies the factual and legal references for that review. (Dkt. 0521, pp. 8–23, §§ I–VI.)

06. The material beyond page 15 includes the amendment analysis, the principal Rule 137 analysis and account of Plaintiff's prefiling inquiry, and the fee-deferral request. The prayer for relief appears on page 24, and the limited verification and service certificate appear on page 25. These portions complete the grounds and supporting presentation of the pending request. (Dkt. 0521, pp. 16–17, ¶¶ 43–50; pp. 18–23, ¶¶ 51–71; pp. 24–25.)

07. This request concerns the length of the submission already on the docket. Plaintiff seeks consideration of the same text and exhibits, with the September 4, 2026 filing date reflected on the Clerk's stamp retained. Approval would permit the Court to decide the pending request on its complete written presentation without requiring a replacement filing. (Dkt. 0521, p. 1.)

08. Docket No. 0521 contains a certificate stating that it was electronically served on September 4, 2026. (Dkt. 0521, p. 25.) Approval of its length adds no new argument or evidence for Flynn to address. Any response opportunity remains subject to the Court's direction, including paragraph 5 of the August 26 Order permitting Flynn to seek leave to respond. (Dkt. 0516, p. 2, ¶ 5.)

09. Plaintiff asks the Court to determine this request before excluding or declining to consider Docket No. 0521 because of its length or the absence of prior page-limit approval. To the extent necessary, Plaintiff requests permission to present this motion at the existing September 14,

2026, 10:00 a.m. setting on shortened notice and to provide courtesy materials as the Court directs. If additional time is needed to resolve this request, Plaintiff asks that any decision to exclude the previously filed motion on those grounds be deferred until the Court resolves this request.

10. WHEREFORE, Plaintiff respectfully requests that the Court:

A. Approve the 25-page length of Docket No. 0521 under Local Rule 2.01(Q) and excuse the absence of prior approval for that submission;

B. Accept and consider Docket No. 0521 in its entirety, with its existing attached/embedded exhibits and September 4, 2026 filing date retained;

C. Determine this request before excluding or declining to consider the previously filed motion because of its length or the absence of prior page-limit approval;

D. Allow presentation of this request on shortened notice at the existing September 14, 2026, 10:00 a.m. setting to the extent necessary and direct the timing of any required courtesy materials; and

E. Grant such other relief as the Court deems just.

Respectfully submitted,

/s/ Paul R. Dulberg

Paul R. Dulberg, Plaintiff pro se

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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

Date: September 11, 2026

CERTIFICATE OF SERVICE

I certify that on September 11, 2026, I served a true and correct copy of the foregoing document on all counsel and parties of record through eFileIL/EFSP electronic service.

/s/ Paul R. Dulberg

Date: September 11, 2026

Paul R. Dulberg

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