

**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 ADDITIONAL TIME TO SEEK LEAVE TO AMEND
REMAINING MOTIONS TO RECONSIDER, FOR A 30-PAGE LIMIT, AND TO
CONTINUE RELATED MERITS ARGUMENTS AND RULE 304(a) REQUESTS**

NOW COMES Plaintiff, Paul R. Dulberg, pro se, and pursuant to the August 26, 2026 Order, section 2-1007 of the Code of Civil Procedure (735 ILCS 5/2-1007), and Twenty-Second Judicial Circuit Local Rules 2.01(N) and (Q), requests additional time through September 28, 2026, to seek leave to amend the three pending reconsideration motions identified below, advance approval of a maximum of 30 pages for each proposed amended motion, and a continuance of the related merits arguments and pending Rule 304(a) requests. In support, Plaintiff states:

- 01.** This request concerns the pending motions to reconsider involving: (a) Thomas W. Gooch, Sabina Serшон, and The Gooch Firm; (b) Edward X. Clinton, Julia Williams, and Clinton Law Firm, LLC; and (c) Thomas J. Popovich and Hans A. Mast. Plaintiff is addressing the Talarico reconsideration amendment and the length of the previously filed Flynn reconsideration motion through separate motions.
- 02.** The August 26 Order entered and continued the pending reconsideration motions, permitted Plaintiff to file a motion for leave to amend them, and set argument for September 14, 2026, at 10:00 a.m. Paragraph 4 does not specify a separate deadline for seeking leave to amend. (August 26, 2026 Order, Dkt. 0516, p. 1, ¶ 1; p. 2, ¶¶ 4, 10.) Plaintiff requests a definite period to complete the proposed amendments before disposition of the three reconsideration matters identified in paragraph 01.
- 03.** Plaintiff requests through Monday, September 28, 2026, to file and serve separate motions for leave, each presenting the completed proposed amended reconsideration motion and its identified supporting exhibits. Plaintiff may submit each leave package earlier as it is completed.

Each proposed amendment will be presented for the Court's determination of leave under paragraph 4 of the August 26 Order. (Dkt. 0516, p. 2, ¶ 4.)

04. Good cause supports the additional time. Since the August 26 hearing, Plaintiff has prepared and filed the Flynn reconsideration motion and completed the proposed Talarico amendment and its leave materials. The Flynn filing contains 25 pages and seven supporting exhibits. (Plaintiff's Flynn Motion to Reconsider, Dkt. 0521, pp. 1–25 and attached/embedded exhibits.) The three remaining amendments require review of the distinct grounds addressed in the Court's rulings, the original Complaint, the prior briefing, and the supporting records and exhibits, with accurate page and, where applicable, transcript-line references.

05. The proposed amendments will address the concerns identified by the Court and explain the asserted errors in law as they apply to the respective defendants and the alleged interrelated conduct. At the August 26 hearing, Plaintiff requested an opportunity to address the Court's concerns through amendments, and the Court directed him to seek leave to amend. (August 26, 2026 Report of Proceedings, Dkt. 0517, p. 9, lines 17–21; p. 10, lines 9–11.) Additional time will permit Plaintiff to complete that work and present the proposed amendments in a form the Court and the respective defendants can review.

06. September 28 provides two additional weeks after the currently scheduled argument date. During that period, Plaintiff also remains responsible for the September 23 response to Flynn's fee petition under the existing Order. (Dkt. 0516, p. 1, ¶ 3.) Plaintiff requests a defined completion date for the three remaining leave packages so that their submission and subsequent briefing can proceed on an orderly schedule.

07. Plaintiff requests advance approval under Local Rule 2.01(Q) of up to 30 double-spaced pages for each of the three proposed amended motions identified in paragraph 01. Each 30-page maximum would include the caption, all argument and footnotes, requested relief, signature, verification, and any service certificate within that amended motion, and would exclude separately identified supporting exhibits. The requested limit applies separately to each amended motion.

08. The additional space is needed to connect each asserted error to the pertinent allegations, the Court’s reasoning, and the cited record, and to address the relationship among the underlying proceedings and the respective defendants’ alleged conduct. A maximum of 30 pages permits that presentation with pinpoint citations and readable spacing. Plaintiff will use only the length reasonably necessary for each motion. Advance approval will permit preparation within a known limit before each proposed amendment is submitted with its motion for leave.

09. Plaintiff requests that the Court determine this motion before reaching the merits of the three reconsideration matters identified in paragraph 01 or the related Rule 304(a) requests, and continue their September 14 merits arguments. Plaintiff asks that the existing motions remain pending until the Court determines the respective requests for leave and, if leave is granted, allows completion of the briefing it authorizes. Plaintiff proposes that briefing and any further argument be scheduled when the Court determines leave for each amended motion.

10. The August 26 Order entered and continued the Popovich Defendants’ request for a finding under Illinois Supreme Court Rule 304(a). (Dkt. 0516, p. 1, ¶ 1.) The Clinton Defendants subsequently filed their “Motion Requesting a Finding Pursuant to Illinois Supreme Court Rule 304(a),” bearing a September 8, 2026 filing stamp, seeking a finding allowing an immediate appeal of their dismissal. (Clinton Defendants’ Rule 304(a) Motion, Dkt. 0523, p. 1; p. 5, ¶ 22 and WHEREFORE clause.) Their Notice of Motion sets presentation for September 14, 2026, at 10:00 a.m., in Courtroom 204. (Clinton Defendants’ Notice of Motion, Dkt. 0522, p. 1.)

11. Plaintiff requests that both the Popovich and Clinton Rule 304(a) requests be continued until disposition of the respective reconsideration motions, including determination of the proposed amendments and completion of authorized briefing. That sequence permits the Court to resolve the asserted errors before determining whether to authorize an immediate appeal of the corresponding dismissal. If the Court declines that requested sequence, Plaintiff alternatively requests through September 28, 2026, to file and serve a written response to the Clinton Defendants’ newly filed Rule 304(a) motion, with its determination deferred until that response and any authorized reply have been submitted.

12. Plaintiff requests permission, to the extent necessary, to present this scheduling and page-limit motion on shortened notice at the existing September 14, 2026, 10:00 a.m. setting, and to provide courtesy materials as the Court directs. If further notice or a response is required, Plaintiff requests that the three related merits arguments and both related Rule 304(a) requests be continued sufficiently to permit this motion to be resolved first.

WHEREFORE, Plaintiff respectfully requests that the Court:

- A. Allow through September 28, 2026, for Plaintiff to file and serve separate motions for leave to amend the three reconsideration motions identified in paragraph 01, with each completed proposed amendment and its identified supporting exhibits, and permit earlier submission as each package is completed;
- B. Approve in advance under Local Rule 2.01(Q) a maximum of 30 double-spaced pages for each of those three proposed amended reconsideration motions, counting the material and excluding the supporting exhibits as specified in paragraph 07;
- C. Determine this motion before reaching those reconsideration merits, continue the related September 14 merits arguments, and keep the existing reconsideration motions pending through determination of the respective requests for leave and completion of any authorized briefing;
- D. Set further briefing and any argument when determining the respective requests for leave;
- E. Continue both the Popovich and Clinton Defendants' pending Rule 304(a) requests until disposition of the respective reconsideration motions; alternatively, allow Plaintiff through September 28, 2026, to file and serve a written response to the Clinton Defendants' Rule 304(a) motion and defer its determination until submission of that response and any authorized reply;
- F. Allow presentation of this motion on shortened notice at the existing September 14, 2026, 10:00 a.m. setting to the extent necessary, and direct the timing of courtesy materials; and
- G. 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