

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

PAUL DULBERG,)
PLAINTIFF,)
v.) Case No. 17 LA 377
THE LAW OFFICES OF THOMAS POPOVICH,)
and HANS MAST,)
DEFENDANTS.)

MOTION FOR EXTENSION OF TIME

Plaintiff Paul Dulberg, by and through his attorneys, The Clinton Law Firm, LLC, respectfully request that this Court grant an extension of time for Plaintiff to file his amended pleading. In support of this Motion, Plaintiff states as follows:

1. On or about September 12, 2018, Plaintiff's First Amended Complaint was stricken in part and Plaintiff was granted to October 10, 2018 to replead.
2. On October 15, 2018, Plaintiff's counsel withdrew and Plaintiff was granted time to obtain new counsel.
3. Recently, Plaintiff obtained The Clinton Law Firm to represent him in this case.
4. On November 8, 2018, The Clinton Law Firm filed its appearance.
5. Plaintiff respectfully requests 28 days for counsel to review the file and prepare an amended pleading.
6. Plaintiff brings this motion in good faith, without intention of harassment or delay.

WHEREFORE, Plaintiff respectfully requests 28 days (December 6, 2018) to file his amended pleading and for such further relief that this Court find equitable and just.

Respectfully Submitted,
By: /s/ Julia C. Williams
Julia C. Williams

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