

**IN CIRCUIT COURT OF 22ND JUDICIAL CIRCUIT
MCHENRY COUNTY, ILLINOIS**

PAUL R. DULBERG, Individually and)
THE PAUL R. DULBERG REVOCABLE TRUST,)

Plaintiffs,)

vs.)

Case No. 25 LA000360

THOMAS W. GOOCH, SABINA SERSHON,)
EDWARD X. CLINTON, JULIA WILLIAMS,)
ALPHONSE TALARICO, GEORGE FLYNN,)
THOMAS J. POPOVICH, HANS MAST, THE)
GOOCH FIRM, CLINTON LAW FIRM, LLC.,)
LAW OFFICE OF ALPHONSE A. TALARICO,)

Defendants.)

**DEFENDANTS THOMAS J. POPOVICH AND HANS MAST’S MOTION FOR AN
ENLARGEMENT OF TIME TO ANSWER OR OTHERWISE PLEAD TO PLAINTIFF’S
COMPLAINT**

COMES NOW, Defendants, Thomas J. Popovich and Hans Mast, (collectively the “Defendants”), by and through counsel, Wilson Elser Moskowitz Edelman & Dicker, LLP, and moves this Honorable Court for an enlargement of time up to and including February 12, 2026, to Answer or otherwise plead to Plaintiffs’ Complaint. In support of this Motion for an Enlargement of Time, Defendants state:

1. On December 4, 2025, Plaintiffs, Paul R. Dulberg and the Paul R. Dulberg Revocable Trust filed their Complaint against Defendants.

2. The undersigned was recently retained by the Defendants and filed appearances for them on December 31, 2025.

3. The undersigned is in the process of reviewing the 88-page Complaint and the allegations therein.

4. To that end, the undersigned requires, and respectfully requests, additional time to prepare an appropriate responsive pleading to the Complaint, including time to obtain relevant details and to confer with their clients, in order to prepare a responsive pleading.

5. Accordingly, Defendants respectfully request an enlargement of time to continue its investigation before filing an appropriate responsive pleading.

6. Defendants were served on December 11, 2025, which would make the 30-day responsive pleading deadline January 12, 2026.

7. Defendants respectfully request an extension of that deadline to and including February 13, 2026.

8. This enlargement of time will not prejudice any party and is not being sought for the purpose of delay.

WHEREFORE, Defendants Thomas J. Popovich and Hans Mast, respectfully request that this Honorable Court enter an ORDER: (i) granting this Motion; (ii) extend the time for which the Defendants Popovich and Mast have to Answer or otherwise plead in response to Plaintiffs' Complaint, up to and including February 12, 2026.

Respectfully submitted,
**Thomas J. Popovich and
Hans Mast**

/s/ Kimberly E. Blair
Kimberly E. Blair

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CERTIFICATE OF SERVICE

I certify that on this 5th day of January, 2026, service of a true and complete copy of the above and foregoing was made via upon the following via e-mail:

Plaintiff Appearing Pro Se
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Respectfully submitted,
**Thomas J. Popovich and
Hans Mast**

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/s/ Kimberly E. Blair
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