

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

PAUL R. DULBERG, INDIVIDUALLY AND THE)
PAUL R. DULBERG REVOCABLE TRUST,)

Plaintiffs,)

Case No. 2025 LA 000360

v.)

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.)

MOTION FOR EXTENSION OF TIME

Defendants, Edward X. Clinton and Julia Williams, by their Attorneys, Hinshaw & Culbertson LLP, pursuant to Illinois Supreme Court Rule 183, moves this Honorable Court for an extension of time to answer or otherwise plead to Plaintiff's Complaint at Law, and in support thereof, states:

1. This is a purported action for legal malpractice and other claims.
2. Hinshaw & Culbertson LLP was recently retained to represent the Defendants.
3. Defense counsel are in need of time to familiarize themselves with the facts in this matter. As such, Defendants requests twenty-eight (28) days, through and including February 4, 2026 to answer or otherwise plead to Plaintiff's Complaint at Law.

WHEREFORE, Defendants, Edward X. Clinton and Julia Williams, pursuant to Illinois Supreme Court Rule 183, respectfully requests that this Honorable Court enter an Order extending time to answer or otherwise plead to Plaintiff's Complaint by twenty-eight (28) days, through and including February 4, 2026, and for such further relief as the Court deems to be just and equitable.

Dated: January 7, 2026

Respectfully submitted,

Edward X. Clinton And Julia Williams

By: /s/ Kate Schnake
Kate Schnake
One of Their Attorneys

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