

**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,	)	
vs.	)	
THOMAS W. GOOCH, SABINA SERSHON,	)	
EDWARD X. CLINTON, JULIA WILLIAMS,	)	CASE NO. 25LA360
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 ALTERNATE (SUBSTITUTED) SERVICE

NOW COMES Plaintiff, Paul R. Dulberg and the Paul R. Dulberg Revocable Trust (“Plaintiffs”), pro se, , and pursuant to 735 ILCS 5/2-203, 735 ILCS 5/2-203.1, Illinois Supreme Court Rule 102, and the inherent authority of this Court, respectfully submits this Motion for Alternate (Substituted) Service, and in support thereof states as follows:

I. INTRODUCTION

1. This action arises from claims properly filed against Defendants George Flynn and Sabina Sershon, both of whom are licensed attorneys registered with the Illinois Attorney Registration and Disciplinary Commission (“ARDC”).
2. Plaintiff has exercised reasonable and diligent efforts to effectuate personal service upon each Defendant at their respective business addresses as reflected in ARDC records and otherwise known to Plaintiff, as required by Illinois law.
3. At the time the complaint was issued (Thursday, December 4th, 2025) and subsequent summons was issued Monday, December 8th, 2025, Defendant George Flynn’s ARDC-registered business address was 30 N. LaSalle Street, Suite 1700, Chicago, Illinois 60602, as reflected in an ARDC registration record dated Thursday December 4th, 2025, attached

hereto as **Exhibit EL-3**.¹

4. Plaintiff is informed and believes, and therefore states, that subsequent to the issuance of summons and during the pendency of service efforts, Defendant Flynn changed his business address to 230 W. Monroe Street, Suite 1250, Chicago, Illinois 60606-4718, as reflected in a current ARDC registration record dated as of Saturday January 10, 2026 and attached hereto as **Exhibit EL-4**.¹

5. Despite multiple attempts by the Sheriff of Cook County to effect personal service, personal service has been unsuccessful, not due to any lack of diligence by Plaintiff, but due to Defendants' unavailability, relocation, or evasion.

6. Plaintiff therefore seeks leave of Court to effectuate service by Certified or Registered Mail, Return Receipt Requested, directed to Defendants at their ARDC-registered business addresses, including Defendant Flynn's updated ARDC address, a method reasonably calculated to provide actual notice.

II. FACTUAL BACKGROUND AND DUE DILIGENCE

7. Plaintiff caused summonses to issue for each Defendant at the following ARDC-registered addresses on file at the time service was initiated:

a. George Flynn
30 N. LaSalle Street, Suite 1700
Chicago, Illinois 60602
(ARDC registration record dated during service period, **Exhibit EL-3**)¹

b. Sabina Sershon
1475 E. Woodfield Road, Suite 700
Schaumburg, Illinois 60173
Exhibit EL-5¹

8. During the course of service efforts, Plaintiff learned that Defendant Flynn had moved his business office from 30 N. LaSalle Street, Suite 1700, Chicago, Illinois 60602, to 230 W. Monroe Street, Suite 1250, Chicago, Illinois 60606, as reflected in the ARDC registration record dated as of Saturday January 10, 2026, attached hereto as **Exhibit EL-4**.¹

9. The Sheriff of Cook County attempted personal service upon each Defendant on multiple

¹ All exhibits are attached as separate files to this document under the paperclip icon in Adobe PDF software.

separate dates and times, as reflected in the attached Sheriff's Returns of Service, which are incorporated herein by reference and attached as **Exhibit EL-1**¹ and **Exhibit EL-2**.¹

10. Each attempt at personal service was unsuccessful, with the Sheriff's returns indicating non-service, moved, or no contact.

11. Plaintiff submits the attached Affidavits of Due Diligence, incorporated herein and attached as **2026-01-11_AFFIDAVIT-OF-DUE-DILIGENCE_George-Flynn_NOTORIZED.pdf**¹ and **2026-01-11_AFFIDAVIT-OF-DUE-DILIGENCE_Sabina-Sershon_NOTORIZED.pdf**¹, which attest under oath to the reasonable and good-faith efforts undertaken to locate and personally serve each Defendant.

12. Plaintiff is informed and believes, and therefore states, that no reliable residential address for either Defendant is presently known to Plaintiff, and that Defendants' ARDC-registered business addresses constitute the most authoritative and legally mandated locations for service.

13. Given Defendants' status as licensed Illinois attorneys and officers of the court, service via Certified or Registered Mail, Return Receipt Requested, directed to their ARDC-registered business addresses—including Defendant Flynn's updated address as reflected in **Exhibit EL-4**¹—is particularly appropriate and reasonably calculated to provide actual notice of these proceedings.

III. LEGAL STANDARD

14. Under 735 ILCS 5/2-203, when personal service cannot be made with reasonable diligence, a court may authorize alternate or substituted service so long as the method ordered is reasonably calculated to give actual notice of the proceedings by utilizing 735 ILCS 5/2-203.1 Service by special order of court.

15. Illinois courts recognize that certified or registered mail may constitute an appropriate form of alternate service where traditional personal service has been diligently attempted and has failed.

¹ All exhibits are attached as separate files to this document under the paperclip icon in Adobe PDF software.

16. The purpose of service is notice, not ritual, and due process is satisfied where the method employed is reasonably certain to inform the defendant of the pending action.

IV. ARGUMENT

17. Plaintiff has satisfied the due diligence requirement through repeated, documented attempts at personal service by the Sheriff.

18. Defendants' ARDC-registered addresses represent their official, publicly declared locations for receipt of legal correspondence and are therefore reasonably calculated to result in actual notice.

19. Authorizing Service by USPS Certified or Registered Mail, Return Receipt Requested, balances judicial economy, fairness, and due process while preventing undue delay of these proceedings.

20. No prejudice will result to Defendants, who by virtue of their professional licensure are uniquely positioned to understand and respond to legal process.

V. RELIEF REQUESTED

WHEREFORE, Plaintiffs respectfully request that this Court:

- A. Grant Plaintiff leave to serve Defendants George Flynn and Sabina Serzhon by alternate (substituted) service;
- B. Authorize Service of the Summons and Complaint via United States Postal Service Certified or Registered Mail, Return Receipt Requested, directed to each Defendant's ARDC-registered address;
- C. Deem service complete upon mailing, or alternatively upon delivery as evidenced by return receipt, as the Court deems appropriate;
- D. Grant such other and further relief as this Court deems just and proper.

Respectfully submitted Pro se for Plaintiffs: PAUL R. DULBERG, INDIVIDUALLY
AND THE PAUL R. DULBERG REVOCABLE TRUST,

by: /s/ Paul R. Dulberg

Paul R. Dulberg

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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