

**THE UNITED STATES OF AMERICA
IN THE CIRCUIT COURT OF THE SIXTEENTH JUDICIAL CIRCUIT
MCHENRY COUNTY, ILLINOIS**

PAUL R. DULBERG, INDIVIDUALLY
and THE PAUL R. DULBERG REVOCABLE
TRUST,

Plaintiffs,

v.

TOMAS W. GOOCH, SABRINA 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 ALPONSE A. TALARICO.

Defendants.

Case No.: 2025 LA 000360

**MOTION TO VACATE DEFAULTS TECHNICAL OR OTHERWISE
AND FOR ADDITIONAL TIME TO FILE RESPONSIVE PLEADINGS**

NOW COMES, your Defendant, THOMAS W. GOOCH, III, Defendant Pro Se, and pursuant to this Motion to Vacate Defaults Technical or Otherwise and for Additional time to File Responsive Pleadings states the following:

1. Defendant's Response was due on January 23, 2026. However, due to the demands of other business Defendant was unable to file responsive pleadings.

WHEREFORE, your Defendant, THOMAS W. GOOCH, prays this Honorable Court grant his Motion to Vacate Defaults Technical or Otherwise and grant additional time to file responsive pleadings.

Respectfully Submitted,

/s/ Thomas W. Gooch
Defendant Pro Se

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