

**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. )

Case No.: 2025 LA 000360

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. )

**NOTICE OF MOTION**

To: See Service List

PLEASE TAKE NOTICE that on this 10<sup>th</sup> day of February 2026, at 9:00 a.m., or as soon thereafter as counsel may be heard, I shall appear before the Honorable Judge Kevin Costello, or any Judge presiding in his stead, in Courtroom 204 via Zoom of the McHenry County Courthouse, 2200 N. Seminary, Woodstock, Illinois and present to the Court the attached for hearing: ***Defendant Thomas W. Gooch's Motion to Vacate Defaults Technical or Otherwise and For Additional Time to File Responsive Pleadings.***

/s/Thomas W. Gooch  
Attorney at Law

**PROOF OF SERVICE**

The undersigned hereby states under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109 that the above notice and any attached pleadings were sent via email and via Odyssey e-filing in Wauconda, Illinois, to the parties indicated above on February 4, 2026.

/s/Leanne Kephart  
Paralegal

**THE GOOCH FIRM**

ARDC No.: 3123355

209 S. Main Street

Wauconda, IL 60084

847-526-0110

[gooch@goochfirm.com](mailto:gooch@goochfirm.com)

[office@goochfirm.com](mailto:office@goochfirm.com)

## **SERVICE LIST**

Paul R. Dulberg [Paul\\_Dulberg@comcast.net](mailto:Paul_Dulberg@comcast.net)  
4606 Hayden Court  
McHenry, Illinois 60051

Kimberly Blair [Kimberly.blair@wilsonelser.com](mailto:Kimberly.blair@wilsonelser.com)  
Robert Merlo [Robert.merlo@wilsonelser.com](mailto:Robert.merlo@wilsonelser.com)  
Kavi Modi [Kavi.modi@wilsonelser.com](mailto:Kavi.modi@wilsonelser.com)  
Wilson Elser Moskowitz Edelman & Dicker, LLP  
161 North Clark Street, Ste. 4500  
Chicago, IL 60601  
(312) 704-0550

Kate Schnake [kschnake@hinshawlaw.com](mailto:kschnake@hinshawlaw.com)  
Camille D. Evans [cevans@hinshawlaw.com](mailto:cevans@hinshawlaw.com)  
Hinshaw & Culbertson LLP  
151 North Franklin Street, Ste. 2500  
Chicago, IL 60606  
Phone: 312-704-3000