

IN THE CIRCUIT COURT OF THE TWENTY-SECOND JUDICIAL CIRCUIT
McHENRY COUNTY, ILLINOIS

AIB

PAUL R. DULBERG	)	
	)	
Plaintiff,	)	
	)	
vs.	)	
THOMAS W. GOOCH, SABINA	)	
SERSHON, EDWARD X. CLINTON, JULIA	)	
WILLIAMS, ALPHONSE TALARICO,	)	CASE NO. 25LA360
GEORGE FLYNN, THOMAS J. POPOVICH,	)	
HANS MAST, THE GOOCH FIRM,	)	
CLINTON LAW FIRM, LLC., LAW OFFICE	)	
OF ALPHONSE A. TALARICO	)	
Defendants,	)	

PLAINTIFF'S RESPONSE IN OPPOSITION TO DEFENDANT GEORGE K.
FLYNN'S MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE
PLEADING

Plaintiff, PAUL R. DULBERG, pro se, responds to Defendant George K. Flynn's Motion for Extension of Time to File Responsive Pleading and states as follows:

1. Defendant Flynn noticed his Motion for hearing on February 26, 2026 at 9:00 a.m. before Judge Berg and requests a 60-day extension (through April 27, 2026) to answer or otherwise plead. (Later continued to March 20, 2026)
2. Defendant Flynn's motion is premised on the assertion that Dulberg violated 735 ILCS 5/2-203 by not attempting personal service at Defendant Flynn's residence or in his county of residence. That assertion is not a valid basis for the requested extension because this Court already entered an Order authorizing alternate service pursuant to 735 ILCS 5/2-203.1. **(Exhibit ER-1)**¹
3. On January 21, 2026, this Court granted Dulberg's Motion for Alternate (Substituted) Service and authorized service pursuant to 735 ILCS 5/2-203.1 via (a) regular mail, (b) certified mail, and (c) posting, directed to the respective ARDC addresses of Defendants George Flynn and Sabina Sershon. The Order further states that "Defendants shall answer or otherwise plead within the time prescribed by law."
(Exhibit ER-1)¹

¹ Attached as: Exhibit ER-1_2025LA000360--2026-01-21--ORD_0392.pdf

4. Dulberg complied with the Court's January 21, 2026 Order. Dulberg filed an Affidavit of Service **(Exhibit ER-2)**¹ stating that service was completed by:

- a. Posting on February 5, 2026 at 4:02 p.m. at 230 W. Monroe, Suite 1250, Chicago, Illinois; and
- b. Mailing via U.S. First Class Mail (regular mail) and Certified Mail on February 6, 2026 at 11:25 a.m., with the certified mail tracking number stated in the affidavit.

5. Defendant Flynn has filed an Appearance in this case as "Regular Counsel," listing his ARDC number and listing his business address as 230 W. Monroe St., Ste. 1250, Chicago, Illinois 60606, and listing his firm email address. Defendant Flynn's filings therefore confirm notice and participation. **(Exhibit ER-3)**²

6. Defendant Flynn's request to extend his deadline to respond by an additional 60 days (to April 27, 2026) is not supported by good cause. If Defendant Flynn intends to challenge the pleadings, he may file a motion to dismiss on the normal schedule. If Defendant Flynn intends to challenge service or personal jurisdiction, the proper vehicle is a motion under 735 ILCS 5/2-301. A 60-day delay is unnecessary.

7. Defendant Flynn's motion also includes extensive merits arguments and threats of sanctions. Those matters are not germane to a scheduling request and should not be used to justify delay. Any merits motion or sanctions request should be presented by proper motion and on the schedule the Court sets.

WHEREFORE, Dulberg respectfully requests that Defendant Flynn's Motion for Extension of Time be DENIED. In the alternative, if the Court grants any extension, Dulberg requests the Court grant only a short, reasonable extension and set a date certain by which Defendant Flynn must file an Answer or other responsive pleading.

Submitted by: /s/ Paul R. Dulberg
Paul R. Dulberg (pro se)
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1 Attached as: Exhibit ER-2_2025LA000360--2026-02-13--PROS_0410.pdf

2 Attached as: Exhibit ER-3_2025LA000360--2026-02-13--APE_0423.pdf

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

CERTIFICATE OF SERVICE

I certify that on **3/5/2026**, I served this document on all counsel/parties of record via eFileIL/ EFSP electronic service to the extent available, and by email to any party not on eFile service.

/s/ Paul R. Dulberg

Date: **3/5/2026**