

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

PAUL R. DULBERG)
)
Plaintiff,)
)
vs.) CASE NO. **25LA360**
)
THOMAS W. GOOCH, *et al.*,)
)
Defendants,)

PLAINTIFF'S MOTION FOR SUBSTITUTION OF JUDGE AS OF RIGHT

Plaintiff Paul R. Dulberg, appearing pro se, pursuant to 735 ILCS 5/2-1001(a)(2), moves for substitution of judge as of right from the Honorable Joel D. Berg and states as follows:

1. This action is pending in the Circuit Court of the Twenty-Second Judicial Circuit, McHenry County, Illinois, as Case No. 25LA360.
2. Plaintiff seeks his one substitution of judge without cause as a matter of right under 735 ILCS 5/2-1001(a)(2).
3. Plaintiff has not previously been granted a substitution of judge as of right in this case.
4. This Motion is timely under 735 ILCS 5/2-1001(a)(2)(ii) because it is presented before trial or hearing begins and before the judge to whom it is presented has ruled on any substantial issue in the case.
5. Reasonable notice of this motion is being provided to all adverse parties or their counsel by separate Notice of Motion filed concurrently herewith.

WHEREFORE, Plaintiff respectfully requests that this Court:

- A. Grant Plaintiff's Motion for Substitution of Judge as of Right;
- B. Enter an order substituting the Honorable Joel D. Berg from further proceedings in this matter; and
- C. Refer the matter for reassignment to a different judge as provided by law.

Submitted by:

/s/ Paul R. Dulberg Date: **March 17, 2026**

Paul R. Dulberg, Plaintiff pro se

4606 Hayden Ct. McHenry, IL 60051

(847) 497-4250

Paul_Dulberg@comcast.net