

**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,)

NOTICE OF MOTION

TO: All counsel of record and all self-represented parties of record.

PLEASE TAKE NOTICE that on **July 28, 2026**, at **9:00 a.m.**, or as soon thereafter as the matter may be heard, Plaintiff Paul R. Dulberg will appear before the Honorable Kevin G. Costello, or any judge sitting in his stead, in Courtroom 204 of the Michael J. Sullivan Judicial Center, McHenry County Courthouse, 2200 N. Seminary Avenue, Woodstock, Illinois 60098, and then and there will present **Plaintiff Paul R. Dulberg's Motion for Leave to File Consolidated Sur-Reply Instantner to Defendants' Replies in Support of Their Motions to Dismiss.**

Plaintiff will request that the Court enter an order granting Plaintiff leave to file the Consolidated Sur-Reply instantner, deeming the Proposed Consolidated Sur-Reply attached to the Motion as Exhibit ET filed instantner as of the date of the Court's order granting the Motion, and granting such other and further relief as the Court deems just.

Copies of the Motion for Leave to File Consolidated Sur-Reply Instantner and Exhibit ET, Proposed Consolidated Sur-Reply, are served with this Notice of Motion.

SERVICE RECIPIENTS

Recipient / Law Firm	Service Method	Service E-mail or Mailing Address
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CERTIFICATE OF SERVICE / PROOF OF DELIVERY

Under penalties as provided by law pursuant to 735 ILCS 5/1-109, I certify that on July 16, 2026, before 5:00 p.m., I served a true and correct copy of this **Notice of Motion, Plaintiff Paul R. Dulberg's Motion for Leave to File Consolidated Sur-Reply Instantly**, and **Exhibit ET, Proposed Consolidated Sur-Reply**, upon all counsel and parties of record by eFileIL/EFSP electronic service to the extent available, and by email to any party not served through electronic service, including the persons listed above.

/s/ Paul R. Dulberg Date: **July 16, 2026**

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