THE UNITED STATES OF AMERICA IN THE CIRCUIT COURT OF THE TWENTY-SECOND JUDICIAL CIRCUIT MCHENRY COUNTY, ILLINOIS

PAUL DULBERG,)
Plaintiff,)
v.) No. 17 LA 377
THE LAW OFFICES OF THOMAS J. POPOVICH, P.C., and HANS MAST,)))
Defendant.))

MOTION FOR DEFAULT JUDGEMENT

Plaintiff, PAUL DULBERG (hereinafter also referred to as "DULBERG"), by and through his attorneys, THE CLINTON LAW FIRM, LLC, respectfully requests that this Court enter a default judgment against THE LAW OFFICES OF THOMAS J. POPOVICH, P.C. (hereinafter also referred to as "POPOVICH"), and HANS MAST (hereinafter also referred to as "MAST"). In support of this Motion, Plaintiff states as follows:

- 1. Plaintiff filed his amended complaint on December 6, 2018.
- Defendants were granted to January 11, 2019 to file their responsive pleading. (Exh. A, Order of November 13, 2018)
- 3. The parties agreed to a brief extension for Defendants' to file a responsive pleading.
- 4. To date, Defendants have not filed any response to the Amended Complaint.

WHEREFORE, Plaintiff respectfully requests that this Court enter an order of default against Defendants, set the matter for prove-up on damages and entry of monetary judgment, and for such further relief that this Court deems just and equitable.

Respectfully submitted by,

PAUL DULBERG, Plaintiff, by his attorneys The Clinton Law Firm

/s/ Julia C. Williams

Julia C. Williams

Edward X. Clinton, Jr., ARDC No. 6206773 Julia C. Williams, ARDC No. 6296386 The Clinton Law Firm 111 W. Washington, Ste. 1437 Chicago, IL 60602 312.357.1515 ed@clintonlaw.net juliawilliams@clintonlaw.net

IN THE CIRCUIT COURT OF THE 22ND JUDICIAL CIRCUIT	
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Prepared by: Tulia Hilliams / Thu Manion (au	
Attorney for: District Property And	