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

PAUL DULBERG,)	
Plaintiff,)	
)	No.: <u>17 LA 377</u>
v.)	
)	
THE LAW OFFICES OF THOMAS J.)	
POPOVICH, P.C. and HANS MAST,)	
Defendants.)	

MOTION FOR ADDITIONAL TIME TO FILE A SECOND AMENDED COMPLAINT

NOW COMES, your Plaintiff, PAUL DULBERG, (hereinafter referred to as "DULBERG") by and through his attorneys, THE GOOCH FIRM, and for his Motion states to the Court the following:

- That on September 12, 2018 this Honorable Court granted Plaintiff until October 10,
 2018 to file his Second Amended Complaint.
- 2. That recently, there has been a break down of communication between Plaintiff and his attorneys.
- 3. THE GOOCH FIRM, is concurrently filing a Motion to Withdraw their appearance on behalf of Plaintiff, PAUL DULBERG.
- 4. Plaintiff will need additional time to file his Second Amended Complaint, after the twenty-one (21) days to hire new counsel expires.

WHEREFORE your Plaintiff PAUL DULBERG prays this Honorable Court grants

Plaintiff additional time to file his Second Amended Complaint, after retaining new counsel or filing his *pro se* appearance, and for all other relief this Honorable Court deems equitable and just.

Respectfully submitted by THE GOOCH FIRM, on behalf of PAUL DULBERG, Plaintiff,

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Thomas W. Gooch, III

THE GOOCH FIRM 209 S. Main Street Wauconda, IL 60084 847-526-0110 gooch@goochfirm.com office@goochfirm.com ARDC: 3123355