

Subject: Defendants' Courtesy Copies
Date: Wednesday, January 3, 2018 at 12:46:47 PM Central Standard Time
From: Stef
To: pdulberg@comcast.net
CC: Office Office
Attachments: Defs' (FS) Mot for Extension of Time.pdf, NOM (FS) Defs' Mot of Extension of Time.pdf, 12.29.17 Clausen Ltr to Judge Meyer RE Courtesy Copies.pdf, Appearance (FS) Flynn Defendants.pdf

Good afternoon Paul –

Attached please find the letter to Judge Meyer with courtesy copies of the Defendants' Motion for Extension of Time and Appearance.

Best,
Stefanie Hein
Office Assistant

The Gooch Firm
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IN THE CIRCUIT COURT OF THE TWENTY-SECOND JUDICIAL CIRCUIT
MCHENRY COUNTY, ILLINOIS

Katherine M. Keefe
Clerk of the Circuit Court
Electronically Filed
Transaction ID: 17111124308
17LA000377
12/28/2017
McHenry County, Illinois
22nd Judicial Circuit

PAUL DULBERG,

Plaintiff,

vs.

No. 17LA000377

THE LAW OFFICES OF THOMAS J.
POPOVICH, P.C., and HANS MAST,

Defendants.

**DEFENDANTS' MOTION FOR EXTENSION OF TIME
TO ANSWER OR OTHERWISE PLEAD**

Defendants, LAW OFFICES OF THOMAS J. POPOVICH, P.C., and HANS MAST, by
and through their attorneys, GEORGE K. FLYNN, and CLAUSEN MILLER P.C., move this
Honorable Court for an extension of time in which to answer or otherwise plead to Plaintiff's
Complaint at Law for twenty-eight days, up to and including February 7, 2018.

/s/ George K. Flynn

GEORGE K. FLYNN
CLAUSEN MILLER P.C.

GEORGE K. FLYNN
CLAUSEN MILLER P.C.
ARDC No. 6239349
10 South LaSalle Street
Chicago, Illinois 60603-1098
(312) 855-1010
Attorneys for Defendants
gflynn@clausen.com

27 9517 00 7

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

PAUL DULBERG,

Plaintiff,

vs.

THE LAW OFFICES OF THOMAS J.
POPOVICH, P.C., and HANS MAST,

Defendants.

No. 17LA000377

Katherine M. Keefe
Clerk of the Circuit Court
Electronically Filed
Transaction ID: 17111124308
17LA000377
12/28/2017
McHenry County, Illinois
22nd Judicial Circuit

NOTICE OF MOTION

TO: Mr. Thomas W. Gooch, III
The Gooch Firm
209 S. Main Street
Wauconda, IL 60084
gooch@goochfirm.com

On January 10, 2018 at 9:00 a.m., or as soon thereafter as counsel may be heard, we shall appear before the Honorable Judge Thomas A. Meyer, or any Judge sitting in his stead in Courtroom 201, in the McHenry County Government Center, 2200 N. Seminary Avenue, Woodstock, Illinois and present Defendants' Motion for Extension of Time to Answer or Otherwise Plead, a copy of which is attached and served upon you herewith.

/s/ George K. Flynn

GEORGE K. FLYNN
CLAUSEN MILLER P.C.

GEORGE K. FLYNN
CLAUSEN MILLER P.C.
ARDC No. 6239349
10 South LaSalle Street
Chicago, Illinois 60603-1098
312-855-1010
Attorneys for Defendants

1613324.1

STATE OF ILLINOIS)
) SS
COUNTY OF COOK)

PROOF OF DELIVERY

The undersigned states that she served a copy of the foregoing document to the attorneys of record noted above, at their respective addresses by email and U.S. Mail on December 28, 2017.

I certify that everything in the Proof of Delivery is true and correct. I understand that making a false statement on this form is perjury and has penalties provided by law under 735 ILCS 5/1-109.

A handwritten signature in cursive script, reading "Linda A. Walker", is written over a horizontal line.



CLAUSEN MILLER P.C.
CHICAGO, IL
NEW YORK
CALIFORNIA
NEW JERSEY
INDIANA
WISCONSIN

CLAUSEN MILLER LLP
LONDON, ENGLAND



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Studio Legale Corapi, ROME
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December 29, 2017

Honorable Thomas A. Meyer
Judge of the Circuit Court of McHenry County
McHenry County Government Center
2200 N. Seminary Avenue
Woodstock, IL 60098

Re: *Paul Dulberg v. Law Offices of Thomas J. Popovich, P.C., et al.*
Case No: 17LA000377
Our File No.: 27 9517 00 7

Dear Judge Meyer:

The above matter is set before you on January 10, 2018 at 9:00 a.m. Enclosed are courtesy copies of our Notice of Motion and Defendants' Motion for Extension of Time to Answer or Otherwise Plead.

Very truly yours,

CLAUSEN MILLER P.C.

By: *George K. Flynn*

George K. Flynn

GKF:pw
Enclosures
cc: Mr. Thomas W. Gooch, III

STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE 22nd JUDICIAL CIRCUIT
McHENRY COUNTY

Paul Dulberg

vs.

Case Number 17 LA 000377

The Law Offices of Thomas J. Popovich

Katherine M. Keefe
Clark of the Circuit Court
Electronically Filed
Transaction ID: 17111124308
17LA000377
12/28/2017
McHenry County, Illinois
22nd Judicial Circuit

APPEARANCE

I HEREBY ENTER THE APPEARANCE OF

Defendants, Law Offices of Thomas J. Popovich, P.C. and Hans Mast

(Insert the name of the party for whom you are entering your appearance).....

AND MY OWN AS

- | | |
|---|--|
| <input checked="" type="checkbox"/> REGULAR COUNSEL | <input checked="" type="checkbox"/> TRIAL COUNSEL |
| <input type="checkbox"/> SPECIAL & LIMITED APPEARANCE | <input type="checkbox"/> SUBSTITUTE COUNSEL |
| <input type="checkbox"/> PRO-SE | <input type="checkbox"/> COUNSEL IN FORCIBLE ENTRY |
| <input type="checkbox"/> ADDITIONAL COUNSEL | <input type="checkbox"/> APPELLATE COUNSEL |
| <input type="checkbox"/> GUARDIAN AD LITEM | <input type="checkbox"/> COURT APPOINTED COUNSEL |

AND AS (HIS) (HER) (THEIR) COUNSEL IN THE ABOVE ENTITLED CASE.

SIGNED

(Signature of Attorney filing appearance)

Name George K. Flynn/Clausen Miller P.C.

George K. Flynn

Printed Name

ARDC Number 6239349

Attorney for Defendants

Address 10 S. LaSalle Street, 16th Floor

City, State Zip Chicago, IL 60603

Phone 312-855-1010

CC-APP1 (Revised 12/01/06)