

STATE OF ILLINOIS)
) SS
COUNTY OF MCHENRY)

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

PAUL DULBERG,

Plaintiff(s),

vs.

DAVID GAGNON, Individually, and as
Agent of CAROLINE MCGUIRE and
BILL MCGUIRE, and CAROLINE
MCGUIRE and BILL MCGUIRE,
Individually,

Defendant(s).

CASE NO. 12LA000178

FILED
JUN 06 2016
KATHERINE M. KEEFE
MCHENRY CTY. CIR. CLK.

MOTION TO CONTINUE TRIAL

Defendant(s), David Gagnon, by and through the undersigned counsel, move(s) this Court for the entry of an Order to continue the Trial of this matter and as grounds therefore state(s):

1. This mater is set for trial on 9/26/16.
2. Plaintiff has recently disclosed a new expert opinion and discovery and deposition of the expert has been requested by the defendant.
3. The defense reserves the right and is entitled to name an expert in response to the plaintiff's arborist after plaintiff's expert discovery and deposition have been completed.

Wherefore, the defendant respectfully requests that the trial of this matter be stricken and/or continued for a new date.

LAW OFFICE OF STEVEN A. LIHOSIT
200 N. LaSalle Street, Suite 2550
Chicago, IL 60601-1014
Telephone: (312) 558-9824

A handwritten signature in black ink, appearing to read "Shoshan E. Reddington", with a long horizontal line extending to the right.

By: _____

SHOSHAN E. REDDINGTON

Firm No.: 19859

E-MAIL ADDRESS:

ILLINOISLEGAL@ALLSTATE.COM

Attorney Bar No.: 6206186

Attorney for Defendant(s):

David Gagnon