

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 TO WITHDRAW

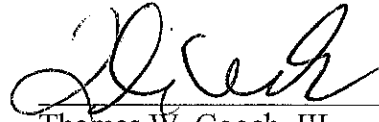
NOW COMES Thomas W. Gooch, III and THE GOOCH FIRM as and for their Motion to Withdraw their Appearance on behalf of Plaintiff, PAUL DULBERG, and in support of the Motion as aforesaid, state to the Court the following:

- 1) That serious and substantial differences in the handling of this case have arisen between the client and the undersigned.
- 2) That there has been a complete and irretrievable breakdown in the attorney-client relationship, communications and the handling of this matter, making further representation of the Plaintiff impossible under these circumstances.
- 3) That Plaintiff should be given 21 days or longer to retain new counsel or to file a *pro se* appearance, and until such time as he has retained new counsel or filed his *pro se* appearance, all notices should be sent to:

Mr. Paul Dulberg
4606 Heydew Ct.
McHenry, IL 60051

WHEREFORE your movant prays this Honorable Court grant THE GOOCH FIRM and Thomas W. Gooch, III leave to withdraw their appearance on behalf of Plaintiff, PAUL DULBERG, *instanter*, and for any other relief deemed equitable and just.

Respectfully submitted by, by
THE GOOCH FIRM,



Thomas W. Gooch, III

Thomas W. Gooch, III
THE GOOCH FIRM
209 S. Main Street
Wauconda, IL 60084
847-526-0110
ARDC No.: 3123355
gooch@goochfirm.com
office@goochfirm.com

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

PAUL DULBERG,)
Plaintiff,) Case No.: 2017 LA 377
v.)
THE LAW OFFICES OF THOMAS J.)
POPOVICH, P.C. and HANS MAST,)
Defendants.)

NOTICE OF FILING

To: George Flynn (gflynn@clausen.com)
Clausen Miller, P.C.
10 South LaSalle Street, 16th Floor
Chicago IL 60603

PLEASE TAKE NOTICE that on **October 8 2018** we filed with the Clerk of the Circuit Court of McHenry County, Illinois, the attached: *Proof of Service of Discovery Documents to Defendants.*

Thomas W. Gooch, III
Thomas W. Gooch, III

PROOF OF SERVICE

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedures, the undersigned certifies that she served a copy of the foregoing to whom it is addressed via McHenry County E-file system and email from Wauconda, Illinois on October 8, 2018.

Thomas W. Gooch, III
Thomas W. Gooch, III

THE GOOCH FIRM
209 S, Main Street
Wauconda, Illinois 60084
847 526 0110
gooch@goochfirm.com
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ARDC No. 3123355

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) No.: 17 LA 377
v.)
)
THE LAW OFFICES OF THOMAS J.)
POPOVICH, P.C. and HANS MAST,)
Defendants.)

NOTICE OF MOTION

TO: George Flynn (gflynn@clausen.com)
Clausen Miller, P.C.
10 South LaSalle Street, 16th Floor
Chicago IL 60603

Please take notice that on **October 15, 2018 at 9:00 a.m.**, or as soon thereafter as counsel may be heard, I shall appear before **The Honorable Judge Meyer in Room 201**, or any judge sitting in his stead, in the courtroom usually occupied by him in the McHenry County Courthouse, Woodstock, Illinois, and then and there present, **Motion to Withdraw**.

/s/Thomas W. Gooch, III
Thomas W. Gooch, III

PROOF OF SERVICE

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedures, the undersigned certifies that he served a copy of the foregoing to whom it is addressed via email and Odyssey E-filing system from Wauconda, Illinois on October 9, 2018, before 5:00 p.m.

/s/Thomas W. Gooch, III

Thomas W. Gooch, III
THE GOOCH FIRM
209 South Main Street
Wauconda, Illinois 60084
847-526-0110
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PAUL DULBERG,)
Plaintiff,) Case No.: 2017 LA 377
v.)
)
THE LAW OFFICES OF THOMAS J.)
POPOVICH, P.C. and HANS MAST,)
)
Defendants.)

PROOF OF SERVICE OF DISCOVERY DOCUMENTS

To: George Flynn (gflynn@clausen.com)
Clausen Miller, P.C.
10 South LaSalle Street, 16th Floor
Chicago IL 60603

I HEREBY CERTIFY THE FOLLOWING DOCUMENTS WERE SERVED TO THE ABOVE NAMED:

- 1) Plaintiff's First Request for Production of Documents to Defendants;
- 2) Plaintiff's First Set of Interrogatories to Defendants; and
- 3) Plaintiff's 213(f) (1)(2) & (3) Interrogatories to Defendants.

Via McHenry County E-file system and email from Wauconda, Illinois before 5:00 p.m. on October 8, 2018.

Thomas W. Gooch, III
Thomas W. Gooch, III

THE GOOCH FIRM
209 S, Main Street
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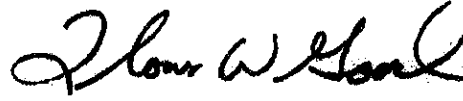
MOTION FOR ADDITIONAL TIME TO FILE A SECOND AMENDED COMPLAINT

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:

1. 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,



Thomas W. Gooch, III

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

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NOTICE OF MOTION

TO: George Flynn (gflynn@clausen.com)
Clausen Miller, P.C.
10 South LaSalle Street, 16th Floor
Chicago IL 60603

Please take notice that on **October 15, 2018 at 9:00 a.m.**, or as soon thereafter as counsel may be heard, I shall appear before **The Honorable Judge Meyer in Room 201**, or any judge sitting in his stead, in the courtroom usually occupied by him in the McHenry County Courthouse, Woodstock, Illinois, and then and there present, **Motion for Additional Time to File a Second Amended Complaint.**

/s/Thomas W. Gooch, III
Thomas W. Gooch, III

PROOF OF SERVICE

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedures, the undersigned certifies that he served a copy of the foregoing to whom it is addressed via email and Odyssey E-filing system from Wauconda, Illinois on October 9, 2018, before 5:00 p.m.

/s/Thomas W. Gooch, III

Thomas W. Gooch, III
THE GOOCH FIRM
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Wauconda, Illinois 60084
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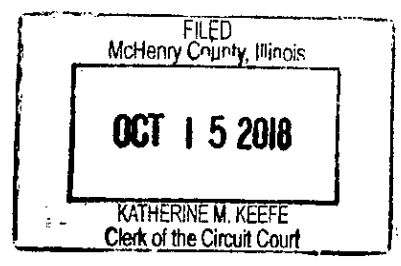
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IN THE CIRCUIT COURT OF THE 22ND JUDICIAL CIRCUIT

STATE OF ILLINOIS)
) SS
COUNTY OF MCHENRY)

GEN. NO. 17 LA 377
 Jury Non-Jury

Dulberg vs. Mast



Date: 10/15/18 Plaintiff's Attorney S. Walczyk Defendant's Attorney G. Flynn

ORDER

Matter before the Court on Plaintiff's Motion for Extension of Time and Motion to Withdraw

Plaintiff appearing in open court, the Court fully advised in the premises

IT IS ORDERED:

1.) Plaintiff's Motion for Extension of Time is granted and entered and continued. Thomas W Gooch + The Gooch Firm granted leave to withdraw Appearance.

2.) Plaintiff granted 21 days to file his appearance or retain new counsel

3.) All further notices to be sent to:
Mr. Paul Dulberg
4606 Hayden Ct
McHenry, IL 60051

4.) Status of attorney/pleadings set for November 13, 2018 at 9:00 am

Prepared by: S Walczyk

Attorney for: T Dulberg

Attorney Registration No.: 6315819

Judge: [Signature]