

**IN THE CIRCUIT COURT OF THE 22<sup>ND</sup> JUDICIAL CIRCUIT**  
**McHENRY COUNTY, ILLINOIS**

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MARK MCDONALD, individually, as	)	
Special Administrator of the Estate of Julie	)	
McDonald, and as father of Ian McDonald,	)	
Quinlin McDonald, and Chloe McDonald,	)	
minor children,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No.: 12 LA 326
	)	
LAW OFFICES OF THOMAS J.	)	
POPOVICH, P.C., JAMES P. TUTAJ, and	)	
THOMAS J. POPOVICH,	)	
	)	
Defendants,	)	

**PLAINTIFF'S MOTION TO EXTEND**  
**TIME TO DISCLOSE 213(F)(3) WITNESSES**

NOW COMES the Plaintiff, MARK MCDONALD, as Special Administrator of the Estate of Julie McDonald, and as father of Ian McDonald, Quinlin McDonald, and Chloe McDonald, minor children, by and through his attorneys, ROMANUCCI & BLANDIN, LLC, and moves this Honorable Court for an extension of time in which to disclose her 213(f)(3) witnesses in this matter. In support thereof, Plaintiff states as follows:

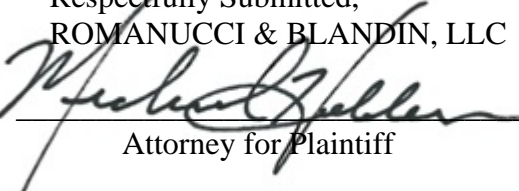
1. This is a legal malpractice action for the alleged malpractice committed in the handling of a medical malpractice action arising out of the death of Julie McDonald on November 16, 2005.

2. On February 19, 2015, this Court ordered Plaintiff to disclose 213(f)(3) witnesses by March 27, 2015.

3. Plaintiff's counsel has been diligent in attempting to retain testifying experts in this matter, but requires additional time to retain a expert pertaining to the underlying medical malpractice matter.

4. Plaintiff now asks for additional 30 days to disclose 213(f)(3) witnesses in order to allow for potential settlement of this matter before incurring further costs regarding expert witnesses.

WHEREFORE, Plaintiff, MARK MCDONALD, as Special Administrator of the Estate of Julie McDonald, and as father of Ian McDonald, Quinlin McDonald, and Chloe McDonald, respectfully requests that this Honorable Court enter an order granting Plaintiff additional time in which to file its 213(f)(3) disclosures, and for any further relief this Court deems fair and just.

Respectfully Submitted,  
ROMANUCCI & BLANDIN, LLC  
By:   
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