

**IN THE CIRCUIT COURT OF THE 22ND JUDICIAL CIRCUIT
McHENRY COUNTY, ILLINOIS**

Katherine M. Keefe

******Electronically Filed******

Transaction ID:1711122891

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05/14/2015

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 VOLUNTARILY DISMISS CASE

NOW COMES the Plaintiff, 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, by and through his attorneys, ROMANUCCI & BLANDIN, LLC, and respectfully move this Honorable Court to voluntarily dismiss this cause of action, pursuant to 735 ILCS 5/2-1009, with leave to re-file this case within 1 year from the entry of the dismissal, pursuant to 735 ILCS 5/13-217. In support thereof, Plaintiff states as follows:

1. This is a legal malpractice case arising out of the dismissal of a wrongful death/medical malpractice action filed in Walworth County, Wisconsin by Defendants, LAW OFFICES OF THOMAS J. POPOVICH, P.C., JAMES P. TUTAJ, and THOMAS J. POPOVICH.

2. Plaintiff now wishes to voluntarily dismiss this cause of action, without prejudice, pursuant to 735 ILCS 5/2-1009.

3. Further, Plaintiff seeks leave to re-file their complaint within 1 year of the entry of the dismissal order, pursuant to 735 ILCS 5/13-217.

WHEREFORE, Plaintiff, 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, respectfully requests that this Honorable Court enter an order voluntarily dismissing this cause of action, without prejudice, pursuant to 735 ILCS 5/2-1009 with leave to re-file this cause of action within 1 year from entry of the dismissal order, pursuant to 735 ILCS 5/13-217; and for any further relief this Honorable Court deems appropriate and just.

Respectfully Submitted,
ROMANUCCI & BLANDIN, LLC

By: 
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