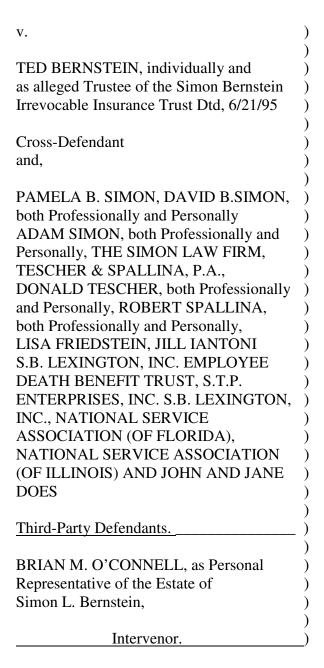
## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

SIMON BERNSTEIN IRREVOCABLE INSURANCE TRUST DTD 6/21/95,	
Plaintiff,	Case No. 13 cv 3643 Honorable John Robert Blakey Magistrate Mary M. Rowland
v. )	
HERITAGE UNION LIFE INSURANCE COMPANY,	
Defendant,	)
HERITAGE UNION LIFE INSURANCE COMPANY	
Counter-Plaintiff	UNOPPOSED MOTION TO ENTER AGREED BRIEFING SCHEDULE
V.	) ) Filer:
SIMON BERNSTEIN IRREVOCABLE INSURANCE TRUST DTD 6/21/95	Brian O'Connell, as Personal Representative of the Estate of Simon L. Bernstein, Intervenor.
Counter-Defendant	
and,	) )
FIRST ARLINGTON NATIONAL BANK as Trustee of S.B. Lexington, Inc. Employee Death Benefit Trust, UNITED BANK OF ILLINOIS, BANK OF AMERICA, Successor in interest to LaSalle National Trust, N.A., SIMON BERNSTEIN TRUST, N.A., TED BERNSTEIN, individually and as purported Trustee of the Simon Bernstein Irrevocable Insurance Trust Dtd 6/21/95, and ELIOT BERNSTEIN,	
Third-Party Defendants.	) )
ELIOT IVAN BERNSTEIN,	) )
Cross-Plaintiff	



## INTERVENOR'S UNOPPOSED MOTION TO ENTER BRIEFING SCHEDULE

NOW COMES Intervenor, Brian M. O'Connell, Personal Representative of the Estate of Simon L. Bernstein ("Intervenor"), and moves this Court to enter a briefing schedule with respect to Plaintiffs' Motion for Summary Judgment. In support of his motion, Intervenor states as follows:

1. Before the Court is Plaintiffs' Motion for Summary Judgment (Dkt. No. 148)<sup>1</sup>.

2. This Court previously entered a briefing schedule granting Third-Party

Defendant/Counter-claimant Eliot Bernstein an extension of time to file a response thereto on

April 6, 2015 (Dkt. No. 158).

3. Counsel for Plaintiffs and Intervenor have conferred and have agreed to apply the

same briefing schedule to Intervenor's response to Plaintiffs' Motion for Summary Judgment.

4. Counsel for Intervenor has submitted a proposed agreed order, via electronic mail

in accordance with the Court's standing orders.

5. No party will be prejudiced by the granting of this Motion.

WHEREFORE, Intervenor prays that the Court enter a briefing schedule on Plaintiffs'

Motion for Summary Judgment which reflects the following:

Intervenor shall file any response to Plaintiffs' Motion for Summary a.

Judgment on or before May 15, 2015;

b. Plaintiffs shall file their reply, if any, on or before May 27, 2015.

Dated: April 7, 2015

Respectfully submitted,

/s/ Kevin P. Horan

One of the attorneys for Intervenor, Brian M. O'Connell, Personal Representative of the Estate of

Simon L. Bernstein

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<sup>1</sup> Plaintiffs filed their Amended Motion for Summary Judgment (Dkt. No. 153) on March 27, 2015.

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## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on April 7, 2015, I electronically filed the foregoing with the Clerk of the Court using CM/ECF. I also certify that the foregoing is being served this day on all counsel of record identified below via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner.

Adam M. Simon The Simon Law Firm 303 E. Wacker Drive, Suite 210 Chicago, IL 60601

Eliot Ivan Bernstein, Pro Se

/s/ Kevin P. Horan
Kevin P. Horan