

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

SIMON BERNSTEIN IRREVOCABLE)	
INSURANCE TRUST DTD 6/21/95,)	
)	
Plaintiff,)	
v.)	Case No. 13 cv 3643
)	
HERITAGE UNION LIFE INSURANCE)	Honorable Amy J. St. Eve
COMPANY,)	Magistrate Mary M. Rowland
)	
Defendant.)	

NOTICE OF MOTIONS

To: See Certificate of Service

PLEASE TAKE NOTICE that on the 29th day of May, 2013 at 8:30 a.m., or as soon thereafter as counsel may be heard, the undersigned shall appear before the Honorable Amy J. St. Eve in Room 1241, United States Courthouse, at 219 South Dearborn Street, Chicago, Illinois, or before any other judge that may be sitting in her place and stead, and then and there present Defendant's (1) Motion for Extension of Time to File its Answer and Counterclaim to Plaintiff's Complaint; and (2) Motion to Tender Insurance Proceeds to Court, copies of which have been filed electronically and are herewith served upon you.

**JACKSON NATIONAL LIFE INSURANCE
COMPANY**

By: /s/ Alexander D. Marks
One of Its Attorneys

Frederic A. Mendelsohn (ARDC No. 6193281)
Alexander D. Marks (ARDC No. 6283455)
Burke, Warren, MacKay & Serritella, P.C.
330 N. Wabash Ave., 22nd Floor
Chicago, Illinois 60611
312-840-7000
312-840-7900 (facsimile)
1424127.1

CERTIFICATE OF SERVICE

The undersigned, an attorney, states that he caused a copy of the foregoing Notice of Motion to be filed electronically with the Northern District of Illinois, and manually served upon the following:

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

By regular mail, postage prepaid, this 23rd day of May, 2013.

/s/ Alexander D. Marks