

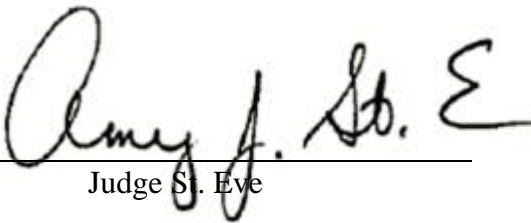
**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

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,	)	
	)	
Defendant.	)	

**AGREED ORDER FOR DEFENDANT'S MOTION TO  
TENDER INSURANCE POLICY PROCEEDS TO COURT**

This matter coming to be heard on the Motion by Defendant to tender the relevant insurance death benefit proceeds, which are at issue in this dispute, to the registry of the Court, due notice being given and the Court being fully advised in the premises, it is HEREBY ORDERED:

- 1) The motion is granted and Defendant is to tender the \$1,703,567.09 death benefit proceeds to the registry of the Court, which includes four percent (4%) interest from the date of death through June 25, 2013;
- 2) Plaintiff retains its rights to raise any further interest issues, including under the Illinois Insurance Code, 215 ILCS 5/224, at a later date; and,
- 3) Defendant's counsel to provide Plaintiffs' counsel with a receipt of deposit upon tender of the funds to the Court's registry.

  
 \_\_\_\_\_  
 Judge St. Eve

Date: June 25, 2013

Prepared By:

Frederic A. Mendelsohn  
 Alexander D. Marks  
 Burke, Warren, MacKay & Serritella, P.C. (#414704)  
 330 N. Wabash Avenue, 21<sup>st</sup> Floor  
 Chicago, IL 60611  
 312-840-7000 (telephone)  
 312-840-7900 (facsimile)