

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)
COMPANY,)
)
Defendant.)

Honorable Amy J. St. Eve
Magistrate Mary M. Rowland

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HERITAGE UNION LIFE INSURANCE)
COMPANY,)
)
Counter-Plaintiff,)

v.)

SIMON BERNSTEIN IRREVOCABLE)
INSURANCE TRUST DTD 6/21/95,)
)
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.)

JOINT MOTION TO EXTEND TIME TO FILE INITIAL STATUS REPORT

Defendant, Jackson National Life Insurance Company ("Jackson"), as successor in interest to Reassure America Life Insurance Company, successor in interest to Heritage Union

Life Insurance Company, and Plaintiff Simon Bernstein Irrevocable Insurance Trust Dtd 6/21/95, jointly move for an extension of time to file their initial status report. In support thereof, the parties state:

1. On May 29, 2013, this Court ordered that the parties were to submit their joint initial status report by July 12, 2013.

2. Since that date, Jackson has filed a counterclaim and third-party complaint for interpleader, naming six new defendants.

3. Jackson has requested waiver of service from certain defendants, and has still not obtained service on other defendants.

4. The parties believe in the interest of judicial economy it is best to extend the status report deadline for 45 days to provide time for service and appearance of some or all of the other parties.

WHEREFORE, Defendant, Jackson National Life Insurance Company, and Plaintiff Simon Bernstein Irrevocable Insurance Trust Dtd 6/21/95 respectfully request that this Court reset the deadline to submit a joint initial status report, and provide such other and further relief as the Court deems just and proper.

**JACKSON NATIONAL LIFE INSURANCE
COMPANY**

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

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**Simon Bernstein Irrevocable Insurance Trust
Dtd 6/21/95**

By: /s/ Adam M. Simon
One of its Attorneys

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

CERTIFICATE OF SERVICE

The undersigned, an attorney, states that he caused a copy of the foregoing Joint Motion to Extend Time to File Initial Status Report 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 U.S. mail, postage prepaid, this 11th day of July, 2013.

/s/ Alexander D. Marks

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