## 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 AGREED MOTION**

To: See Certificate of Service

PLEASE TAKE NOTICE that on the 15th day of July, 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 the parties' Joint Agreed Motion to Extend Time to File Initial Status Report, a copy of which has been filed electronically and is 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., 22<sup>nd</sup> Floor Chicago, Illinois 60611 312-840-7000 312-840-7900 (facsimile)

## **CERTIFICATE OF SERVICE**

The undersigned, an attorney, states that on July 11, 2013, he caused a copy of the foregoing Notice of Agreed Motion to be filed electronically with the Northern District of Illinois, and electronically served upon the following:

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

/s/ Alexander D. Marks