

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.)

HERITAGE UNION LIFE INSURANCE)
COMPANY,)
)
Defendant.)

No. 13 cv 3643

Honorable Amy I. 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.)

**JPMORGAN CHASE BANK'S MOTION FOR EXTENSION
OF TIME TO RESPOND TO THIRD-PARTY COMPLAINT**

Third-Party Defendant JPMorgan Chase Bank, National Association, by its attorney, Glenn E. Heilizer, respectfully move for an extension of time, 21 days, to respond to the third-party complaint. In support of this motion, JPMorgan Chase Bank states as follows:

1. JPMorgan Chase Bank was served with the summons and third-party complaint on October 28, 2013.
2. Additional time reasonably is required to investigate the allegations of the third-party complaint, and to determine how to respond.
3. No party will be prejudiced by the granting of this motion.

Wherefore, third-party defendant JPMorgan Chase Bank, National Association respectfully requests an extension of 21 days to respond to the third-party complaint.

JPMORGAN CHASE BANK,
NATIONAL ASSOCIATION

By: /s/ Glenn E. Heilizer
One of their attorneys

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Dated: November 19, 2013