

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