

**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,)

HERITAGE UNION LIFE INSURANCE)
COMPANY,)

Counter-Plaintiff)

v.)

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

Counter-Defendant)

and,)

JPMORGAN CHASE BANK, N.A.,)
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)

**Case No. 13 cv 3643
Honorable Amy J. St. Eve
Magistrate Mary M. Rowland**

NOTICE OF MOTION

_____)
)
 ELIOT IVAN BERNSTEIN,)
)
 Cross-Plaintiff,)
)
 v.)
)
 TED BERNSTEIN, individually and as)
 alleged Trustee of the Simon Bernstein)
 Irrevocable Insurance Trust Dtd 6/21/95,)
)
 Cross-Defendant,)
)
 and,)
)
 PAMELA B. SIMON, DAVID B. SIMON,)
 both Professionally and Personally,)
 ADAM SIMON, both Professionally and)
 Personally, THE SIMON LAW FIRM,)
 TESCHER & SPALLINA, P.A.,)
 DONALD TESCHER, both Professionally)
 and Personally, ROBERT SPALLINA,)
 both Professionally and Personally,)
 LISA FRIEDSTEIN, JILL IANTONI,)
 S.B. LEXINGTON, INC. EMPLOYEE)
 DEATH BENEFIT TRUST, S.T.P.)
 ENTERPRISES, INC., S.B. LEXINGTON,)
 INC., NATIONAL SERVICE)
 ASSOCIATION (OF FLORIDA),)
 NATIONAL SERVICE ASSOCIATION)
 (OF ILLINOIS) AND JOHN AND JANE)
 DOES,)
)
 Third-Party Defendants.)

NOTICE OF MOTION

TO: All Counsel of Record (Please See Certificate of Service)

PLEASE TAKE NOTICE that on *Wednesday, December 11, 2013, at 1:30 p.m.*, the undersigned shall appear before the *Honorable Judge Amy J. St. Eve* in *Courtroom 1241*, or in the Courtroom usually occupied by her in the United States District Court for the Northern District of Illinois, 219 South Dearborn Street, Chicago, Illinois, and present *Motion to Intervene Pursuant to Fed. R. Civ. P. 24* by *Interested Party William E. Stansbury*, a copy of which was sent via the Court’s E-Filing System.

WILLIAM E. STANSBURY

By: /s/ John M. O'Halloran
John M. O'Halloran (02095076)

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 6, 2013, I electronically filed the foregoing with the Clerk of the Court using CM/ECF. I also certify that the foregoing is being served this day on all counsel of record identified below via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronic Notice of Electronic Filing:

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