

**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.)

Case No. 13 cv 3643

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

et al.

NOTICE OF MOTION

To: See Certificate of Service

PLEASE TAKE NOTICE that on the 12th day of February, 2014 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 Heritage's Combined Motion for Leave to File Amended Appearances, Amended Notice of Removal, and for an Extension of Time to File Responsive Pleading to Amended Complaint, 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., 22nd Floor
Chicago, Illinois 60611
312-840-7000
312-840-7900 (facsimile)
1591651.1

CERTIFICATE OF SERVICE

The undersigned, an attorney, states that on February 3, 2014 he caused a copy of the foregoing Combined Motion for Leave to File Amended Appearances, Amended Notice of Removal, and for an Extension of Time to File Responsive Pleading to Amended Complaint 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

Eliot Bernstein
2753 NW 34th Street
Boca Raton, FL 33434

John M. O'Halloran
McVey & Parsky, LLC
30 North LaSalle Street
Suite 2100
Chicago, IL 60602

/s/ Alexander D. Marks