IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

INSURANCE TRUST DTD 6/21/95,)
Plaintiff,	Case No. 13 cv 3643 Honorable John Robert Blakey Magistrate Mary M. Rowland
v.)	
HERITAGE UNION LIFE INSURANCE COMPANY,)))
Defendant,)
HERITAGE UNION LIFE INSURANCE COMPANY)))
Counter-Plaintiff) NOTICE OF MOTION
v.))
SIMON BERNSTEIN IRREVOCABLE INSURANCE TRUST DTD 6/21/95)) Filer:) Brian O'Connell, as Personal
Counter-Defendant) Representative of the Estate of Simon L. Bernstein, Intervenor;
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.	_)
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. BRIAN M. O'CONNELL, as Personal Representative of the Estate of Simon L. Bernstein, Intervenor.

NOTICE OF MOTION

TO: See Certificate of Service

On Thursday, **June 7, 2016** at **9:45 a.m.** or soon thereafter as counsel may be heard, I shall appear before the **Honorable Judge John Robert Blakey** or any Judge sitting in his stead, in **Room 1725** of the United States Courthouse, 219 S. Dearborn Street, Chicago, Illinois 60604, and shall then and there present **Intervenor's Motion for**

Summary Judgment, a copy of which has been electronically filed and served upon you.

Dated: May 25, 2016

BRIAN M. O'CONNELL, PERSONAL REPRESENTATIVE OF THE ESTATE OF SIMON L. BERNSTEIN, Intervenor

By: /s/ James J. Stamos
One of Intervenor's Attorneys

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that he caused a copy of the foregoing **Notice of Motion for Summary Judgment** to be served upon all registered E-Filers via electronic filing using the CM/ECF system, and to be served upon the following persons via U.S. mail, proper postage prepaid:

Lisa Sue Friedstein 2142 Churchill Lane Highland Park, IL 60035 <u>Lisa@friedsteins.com</u> *Pro Se Litigant* Jill Marla Iantoni 2101 Magnolia Lane Highland Park, IL 60035 jilliantoni@gmail.com Pro Se Litigant

on this 25th day of May, 2016.

/s/ James J. Stamos