

**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 )  
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, )

**Case No. 13 cv 3643  
Honorable John Robert Blakey  
Magistrate Mary M. Rowland**

**Simon Bernstein Irrevocable  
Insurance Trust Dated 6/21/95,  
Ted Bernstein, as Trustee and  
Individually,  
Pamela B. Simon, Jill Iantoni, and Lisa  
Friedstein (“Movants or Plaintiffs”).**

**MOTION FOR LEAVE TO  
FILE A REPLY BRIEF IN EXCESS OF  
FIFTEEN PAGES**

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. )  
\_\_\_\_\_)

Movants, pursuant to Local Rule 7.1, respectfully move this honorable court for an order granting leave to file a reply memorandum of law in further support of their motion for summary judgment in excess of the fifteen page limit, and in support thereof states as follows:

1. Movants are prepared to file their replies to the Estate and Eliot's responses to movants' motion for summary judgment. Movants' reply is due on June 26, 2015.
2. The Estate's response brief is approximately thirteen pages, and Eliot's response brief is fifteen pages, for a combined total of twenty-eight pages of opposition pleadings.
3. In lieu of filing two fifteen page reply briefs, Movants seek leave of the court to file a single, consolidated reply brief in excess of fifteen pages that shall not exceed twenty pages.

WHEREFORE, Plaintiffs pray for an Order granting them leave to file a reply memorandum of law in further support of their motion for summary judgment that exceeds the fifteen page limit.

Dated: June 25, 2015

Respectfully submitted,

/s/ Adam Simon

Adam Simon, Esq.

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Attorney for Plaintiffs