

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

Simon Bernstein Irrevocable
Insurance Trust Dtd 6/21/95, et al.,

Plaintiffs,

v.

Heritage Union Life
Insurance Co., et al.,

Defendants.

Case No. 13-cv-3643

Judge John Robert Blakey

Filers:
Eliot Ivan Bernstein, Pro Se

**MOTION FOR LEAVE TO FILE A BRIEF (MEMORANDUM OF LAW) IN EXCESS
OF FIFTEEN PAGES**

Plaintiffs, pursuant to Local Rule 7.1, respectfully move this Honorable court for an Order granting permission file a Brief (Memorandum of Law) which may exceed the fifteen page limit to support a Motion for Leave to Amend-Supplement the Third Party Complaint / Cross-Claim / Counterclaim to be filed by April 29, 2016 pursuant to this Court's recent Minute-Entry Text Order of April 14, 2016.

In support thereof, Eliot I. Bernstein states as follows:

1. Third Party Defendant Eliot I. Bernstein who was brought into this action by Jackson National is preparing to file a motion for leave to Amend - Supplement the Third Party Complaint / Cross-Claim / Counterclaim herein and file said motion by this Court's deadline of April 29, 2016.

2. As the Court has seen from the recent Summary Judgment filings and submissions and the parties that have been in the case and removed from the case and the complex and factually detailed nature of the fraud and claims background as recently outlined and plead in a motion for an injunction under the All Writs Act and Anti-Injunction Act, it is reasonably possible that the Brief and Memorandum in Support in draft stage may exceed the 15 page limit by 5 pages or so and if said Brief does exceed the 15 page limit, it is respectfully asserted that such extra pages are warranted.
3. I believe that I have dealt with the issues presented by this case and or attempted to deal with the issues in an efficient and succinct manner under the circumstances and am diligently attempting to do so in the Brief in support,

WHEREFORE, Third Party Defendant Eliot I. Bernstein prays for an Order granting leave to file a Brief (Memorandum of Law) in support of a motion for Leave to Amend - Supplement the Third Party Complaint / Cross-Claims / Counterclaims herein that exceeds the fifteen page limit.

Respectfully submitted,

DATED: April 17, 2016

/s/ Eliot Ivan Bernstein

Eliot Ivan Bernstein
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 17, 2016 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.

/s/ Eliot Ivan Bernstein

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