

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

AMP GLOBAL CLEARING, LLC,
DANIEL CULP, and AMP FUTURES

Plaintiffs,

vs.

BIG MIKE TRADING, LLC and,
MICHAEL BOULTER,

Defendants.

No. 2014L1143

FILED-18
2014 APR 22 AM 10:35

NOTICE OF MOTION TO EXTEND TIME
TO RESPOND TO DEFENDANT'S MOTION TO DISMISS
VERIFIED COMPLAINT

TO: Holland & Knight LLP, 131 S. Dearborn, 30th Floor, Chicago, IL 60603

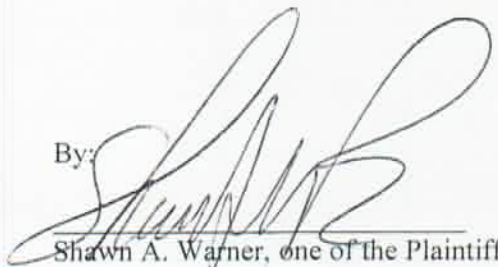
PLEASE TAKE NOTICE that on April 29, 2014 at 9:30 p.m., or as soon thereafter as counsel may be heard, I shall appear before the Honorable Judge Daniel T. Gillespie, or any judge sitting in his stead, in the courtroom usually occupied by him in Room 2202 of the Richard J. Daley Center, Chicago, Illinois, 60602 and then and there present Plaintiff's Motion to Extend Time to Respond to Defendant's Motion to Dismiss Verified Complaint, copies of which are attached hereto. #7

PROOF OF SERVICE

Pursuant to the provisions of 735 ILCS 5/1-109, the undersigned, a non-attorney, certifies that she served a copy of this Notice with attachments upon whom it is directed on April 22, 2014 via facsimile and by depositing a copy of same in the United States mailbox at 155 N. Michigan Avenue, Chicago, Illinois, with proper postage prepaid.

WARNER LAW OFFICE
Attorney No. 40025
155 N. Michigan Avenue
Suite 700
Chicago, Illinois 60601
312-729-5400

By:


Shawn A. Warner, one of the Plaintiffs
Attorneys

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TO RESPOND TO DEFENDANT'S MOTION TO DISMISS
VERIFIED COMPLAINT**

NOW COMES the Plaintiffs, AMP GLOBAL CLEARING, LLC, DANIEL CULP and AMP FUTURES, by and through their attorneys, WARNER LAW OFFCE, and move this Court for additional time to file Plaintiff's Response to Motion to Dismiss Verified Complaint. In support thereof the Plaintiff's state as follows:

1. The attorney for the Plaintiff in this matter is Shawn A Warner. Mr. Warner's Mother went into intensive care for ten days. Mr. Warner is the medical power of attorney for his mother and as such has had to spend weeks out of town. He also had to spend time finding a nursing home that can properly care for his mother's needs.
2. During the briefing time in this matter Mr. Warner also had to write an appellate brief for a matter under the rules for a preliminary injunction which required the matter to be completed in seven days.
3. Given the aforesaid circumstances Mr. Warner was unable to finish the brief in this matter during the allotted time and requests an additional 14 days to respond.

WHEREFORE the Plaintiffs, AMP GLOBAL CLEARING, LLC, DANIEL CULP and AMP FUTURES by and through their attorneys, WARNER LAW OFFCE, move this Court for an additional fourteen (14) days to file Response to Motion to Dismiss Verified Complaint.

Respectfully Submitted,

By: 

One of Plaintiff's Attorneys

Warner Law Office
155 North Michigan Avenue
Suite 700
Chicago, IL 60601
(312) 729-5400
Attorney Number: 40025