

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

TOWNSHIP TRUSTEES OF SCHOOLS TOWNSHIP 38 NORTH, RANGE 12 EAST

v.

LYONS TOWNSHIP HIGH SCHOOL DIST 204

No. 13 CH 23386

NOTICE OF MOTION

To: Stephen M. Mahieu/Dykema Gossett PLLC
10 S. Wacker Drive, Suite 2300
Chicago, IL 60606

On July 16, 2015, at 10:30 a.m. or as soon thereafter as counsel may be heard, I shall appear before the Honorable Sophia Hall, Courtroom 2301 or any Judge sitting in that Judge's stead, in the courtroom usually occupied by him/her, located at Richard J. Daley Center, 50 W. Washington Street, Chicago 60602, Illinois, and present

MOTION FOR SUBSTITUTION OF COUNSEL

Name Barry P. Kaltenbach/Miller Canfield Atty. No. 44233 Pro Se 99500
Address 225 W. Washington Street, 2600 Attorney for Township Trustees
City/State/Zip Chicago, IL 60606 Telephone 312-460-4200

PROOF OF SERVICE BY DELIVERY

I, _____, the attorney non-attorney certify that on the _____ day of _____, I served this notice by delivering a copy personally to each person to whom it is directed.
Date _____
Signature/Certification _____

PROOF OF SERVICE BY MAIL

I, Barry P. Kaltenbach, the attorney non-attorney certify that I served this notice by mailing a copy to Stephen M. Mahieu/Dykema Gossett PLLC at 10 S. Wacker Drive, Suite 2300 (address on envelope) and depositing the same in the U.S. Mail at 225 W. Washington Street, 2600 (place of mailing) at 5:00 a.m. on the 15th day of July, 2015, with proper postage prepaid.
Date July 15, 2015
Signature/Certification _____

PROOF OF ELECTRONIC SERVICE (WHERE PERMISSIBLE)

I, _____, the attorney non-attorney certify that on the _____ day of _____, I served this notice electronically via the Clerk's Office E-filing system, or by telefax transmission (pages) with consent of the recipient where permissible under Ill. Sup Ct. R.11, at fax no. _____ at _____ a.m./p.m., from _____ (Place)
Date _____
Signature/Certification _____

NOTE: If more than one person is served by delivery or mail, additional proof of service may be made by attaching an additional sheet to this Notice of Motion.

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION**

TOWNSHIP TRUSTEES OF SCHOOLS)
TOWNSHIP 38 NORTH, RANGE 12)
EAST,)

Plaintiff,)

vs.)

LYONS TOWNSHIP HIGH SCHOOL)
DISTRICT NO. 204)

Defendants)

No. 13 CH 23386

Judge Sophia H. Hall

Calendar 14

FILED
1-20-14
1-20-14

MOTION FOR SUBSTITUTION OF COUNSEL

NOW COME, Plaintiff, Township Trustees of Schools Township 38 North, Range 12 East and move this Court for the entry of an order substituting MILLER, CANFIELD, PADDOCK AND STONE, P.L.C., as their counsel of record in this action. In support of the motion, Movants state as follows:

1. Movants were initially represented by KUBASIAK, FYLSTRA, THORPE & ROTUNNO, P.C. in connection with this matter.

2. The principal attorneys for Movants in this matter, Gerald E. Kubasiak and Barry P. Kaltenbach, have relocated their practice to the firm of MILLER, CANFIELD, PADDOCK AND STONE, P.L.C.

3. Movants now desire to have MILLER, CANFIELD, PADDOCK AND STONE, P.L.C. represent them in this matter.

4. Accordingly, Movants request that this Court grant MILLER, CANFIELD, PADDOCK AND STONE, P.L.C. leave to substitute as counsel on behalf of Movants, and grant KUBASIAK, FYLSTRA, THORPE & ROTUNNO, P.C. leave to withdraw its appearance in this matter.

5. Movants further request that all pleadings, motions, orders, correspondence and documents filed in the above-captioned case and notice of all hearings be served on MILLER, CANFIELD, PADDOCK AND STONE, P.L.C. at the following address:

MILLER, CANFIELD, PADDOCK AND STONE, P.L.C.
225 W. Washington, Suite 2600
Chicago, IL 60606
Attention: Gerald E. Kubasiak, Barry P. Kaltenbach

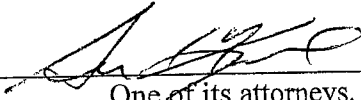
6. The requested substitution is appropriate, reasonable, and fair and will not unduly delay or unfairly prejudice the other parties to this litigation.

WHEREFORE, Plaintiff, Township Trustees of Schools Township 38 North, Range 12 East respectfully request that this Court enter an order granting MILLER, CANFIELD, PADDOCK AND STONE, P.L.C. leave to file its appearance on behalf of Defendants, and granting KUBASIAK, FYLSTRA, THORPE & ROTUNNO, P.C. leave to withdraw its appearance in this matter.

Respectfully submitted,

TOWNSHIP TRUSTEES OF SCHOOLS
TOWNSHIP 38 NORTH, RANGE 12 EAST

By: _____


One of its attorneys.

Gerald E. Kubasiak
Barry P. Kaltenbach
Miller, Canfield, Paddock and Stone, P.L.C.
225 W. Washington Street, Suite 2600
Chicago, Illinois 60606
(312) 460-4200 (Phone)
Firm I.D. No. 44233