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

FILED
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CIRCUIT COURT OF COOK
COUNTY, ILLINOIS
CHANCERY DIV.
DOROTHY BERTHA, CLERK

U.S. Bank, N.A., as trustee for Morgan Stanley Loan)
Trust 2006-16AX,)
Plaintiff/Counter-Defendant,)
vs.)
RICHARD DANIGGELIS,)
Defendant/Counter-claimant and)
Cross-claimant,)

No.: 07 CH 29738

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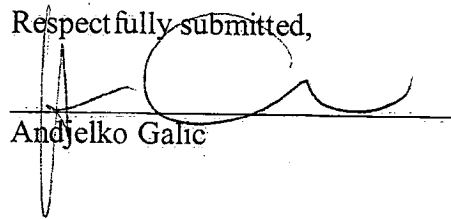
DEFENDANT'S MOTION FOR ADDITIONAL TIME TO REPLY TO PLAINTIFF'S
RESPONSE TO DEFENDANT'S MOTION TO STRIKE AFFIDAVIT OF RASHAD
BLANCHARD AND CERTIFICATION OF RICHARD HANDVILLE

Now comes the Defendant, Richard Daniggelis, by and through his attorney Andjelko Galic and moves this court for additional time to file his Reply to Plaintiff's Response to Defendant's motions to strike the affidavit of Rashad Blanchard and the Certification of Richard Handville submitted in support of Plaintiff's motions for summary judgment. In support of his motion for additional time Defendant Richard Daniggelis states as follows:

1. On February 15, 2013 Defendant was granted until February 20, 2012 to reply to Plaintiff's Response to Defendant's Motion to Strike the affidavit of Rashad Blanchard and the certification of Richard Handville.
2. Due to previous commitments in Defendant attorney's law practice Defendant's attorney Andjelko Galic was simply not able to prepare an adequate reply within the time frame contemplated by the February 15, 2013 order.
3. In addition, Plaintiff's Response to Defendant's motion to strike the affidavit and the certification submitted in support of Plaintiff's motions for summary judgment is voluminous and it brings in a large number of relevant and irrelevant factual allegations and exhibits as well as a whole series of cases from Illinois and from other jurisdiction and the short time granted to Defendant to file his reply is simply not sufficient to read and to digest these cases in order to incorporate them into Defendant's reply.

Wherefore, Defendant Richard Daniggelis, prays for an order granting him at least additional 14 days to file his Reply to Plaintiff's Response to Defendant's Motions to Strike Affidavit of Rashad Blanchard and the Certification of Richard Handville.

Respectfully submitted,



Andjelko Galic

ANDJELKO GALIC
Attorney for Defendant
134 N. LaSalle Street, Suite 1810
Chicago, IL 60602
(312) 986- 1510
Attorney No. 33013