

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

ZURICH SPECIALTIES LONDON LIMITED,

Plaintiff,

v.

**VILLAGE OF BELLWOOD, ILLINOIS, a Municipal
Corporation, GREGORY MOORE, DONALD LEMM,
NICHOLAS NARDUCCI, ST. PAUL MERCURY
INSURANCE COMPANY and ST. PAUL FIRE
& MARINE INSURANCE COMPANY**

Defendants.

**VILLAGE OF BELLWOOD, ILLINOIS, a Municipal
Corporation, GREGORY MOORE, and
DONALD LEMM,**

Counterplaintiffs,

v.

ZURICH SPECIALTIES LONDON LIMITED,

Counterdefendant,

**VILLAGE OF BELLWOOD, ILLINOIS, a Municipal
Corporation, GREGORY MOORE, and
DONALD LEMM,**

Cross-Plaintiffs,

v.

**ST. PAUL MERCURY
INSURANCE COMPANY and ST. PAUL FIRE
& MARINE INSURANCE COMPANY**

Cross-Defendants.

No. 07 cv 2171

Hon. Joan Humphrey Lefkow

**ZURICH'S MOTION FOR JUDGMENT ON THE PLEADINGS AGAINST
ST. PAUL MERCURY AND ST. PAUL FIRE AND MARINE**

Now comes the Plaintiff, Zurich Specialties London Limited, by and through its attorneys, Joseph P. Postel, David S. Osborne and Christopher J. Pickett of Lindsay, Rappaport

& Postel, LLC, and submits the following Motion for Judgment on the Pleadings against Defendants, St. Paul Fire & Marine Insurance Company and St. Paul Mercury Insurance Company. In support hereof, Zurich submits its Joint Memorandum of Law, leave for which to file is sought contemporaneously herewith by separate motion.

WHEREFORE, the Plaintiff, Zurich Specialties London Limited, respectfully prays that this Honorable Court enter an Order, pursuant to Rule 12(c) of the Federal Rules of Civil Procedure, granting judgment on the pleadings in its favor and against Defendants, St. Paul Fire & Marine Insurance Company and St. Paul Mercury Insurance Company as to Counts III, IV, IX and X of its Amended Complaint for Declaratory Judgment. In the alternative, Zurich Specialties London Limited respectfully requests that this Honorable Court render such other and further relief as the Court deems appropriate under the circumstances.

Respectfully submitted,

LINDSAY, RAPPAPORT & POSTEL, LLC,

By: /s/ David S. Osborne
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Bar Number: 06237821

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