

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

DOCKETED
JAN 11 2005

THOMAS J. MORIARTY, trustee on behalf of)
TEAMSTERS LOCAL UNION NO. 727 PENSION)
FUND, TEAMSTERS LOCAL UNION NO. 727)
HEALTH AND WELFARE FUND, and TEAMSTERS)
LOCAL UNION NO. 727 LEGAL AND)
EDUCATIONAL ASSISTANCE FUND,)

Plaintiff,)

v.)

WILLIAM G. PIERSON and ANTHONY)
RAINIERO d/b/a HURSEN FUNERAL HOME,)

Defendants.)

Case No. 04 C 4368

Judge Kocoras
Magistrate Keys

FILED

DEC 20 2004

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

NOTICE OF MOTION

TO: William G. Pierson
Anthony Raniero
4001 W. Roosevelt Road
Hillside, Illinois 60162

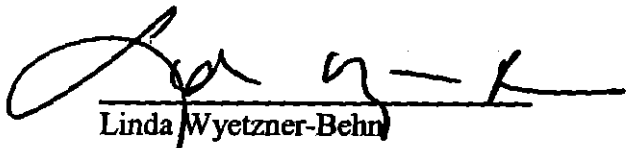
PLEASE TAKE NOTICE that on ~~Tuesday~~¹³, January 4, 2005, at 9:30 AM or as soon thereafter as counsel may be heard, I shall appear before the Honorable Charles P. Kocoras of the Northern District of Illinois, Eastern Division, in his courtroom located at 219 South Dearborn Street, Chicago, Illinois, and then and there present Plaintiff's Motion to Amend Complaint, and First Amended Complaint.


Linda Wyetzner-Behn

Jacobs, Burns, Orlove, Stanton & Hernandez
122 S. Michigan Ave., Suite 1720
Chicago, Illinois 60603-6145
(312) 372-1646

CERTIFICATE OF SERVICE


I, Linda Wyetzner-Behn, an attorney, certify that I caused a copy of Plaintiff's Motion to Amend Complaint, and First Amended Complaint, to be served upon the individual listed above via United States mail on December 20, 2004.


Linda Wyetzner-Behn

Corporation, a corporation in good standing in the State of Illinois, owns the Hursen Funeral Home. See Answers to Interrogatories # 9-12.

WHEREFORE, Plaintiff respectfully requests that this Court order HURSEN HOLDINGS CORPORATION, an Illinois corporation d/b/a HURSEN FUNERAL HOME to be substituted for "WILLIAM G. PIERSON and ANTHONY RAINIERO d/b/a HURSEN FUNERAL HOME."

Respectfully submitted,


Linda Wyetzner-Behn

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