

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

EDWARD RICHERME and KAREN RICHERME,)
)
 Plaintiffs,)
)
 v.)
)
 TRUMBULL INSURANCE COMPANY,)
)
 Defendant,)
)
 _____)
)
 TRUMBULL INSURANCE COMPANY,)
)
 Counter-Plaintiff,)
)
 v.)
)
 EDWARD RICHERME and KAREN RICHERME,)
)
 Counter-Defendants.)

Case No.: 2018 cv 01286

TRUMBULL INSURANCE COMPANY’S MOTION FOR JUDGMENT ON THE PLEADINGS

NOW COMES Defendant/Counter-Plaintiff, TRUMBULL INSURANCE COMPANY (“Trumbull”), by its attorneys Michael J. Duffy and Mark J. Sliwinski of Wilson Elser Moskowitz Edelman & Dicker LLP, hereby moves this Honorable Court for Judgment on the Pleadings on its Counterclaim and on Plaintiffs/Counter-Defendants’, Edward Richerme (“Edward”) and Karen Richerme (“Karen”) (collectively, the “Richermes”), Complaint pursuant to Fed. R. Civ. P. 12(c) for the reasons set forth in Trumbull’s supporting Memorandum of Law, filed contemporaneously herewith.

WHEREFORE, for all of the foregoing reasons, Trumbull respectfully requests that this Court grant its Motion for Judgment on the Pleadings, finding Trumbull owes the Richermes no duty to defend or indemnify, Trumbull did not breach the relevant insurance policy, Trumbull did not act in bad faith, and award Trumbull such other and further relief as this Court deems just and equitable, including an award of costs.

Dated: April 25, 2018

Respectfully submitted,

TRUMBULL INSURANCE COMPANY

By: /s/ Michael J. Duffy

One of Its Attorneys

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CERTIFICATE OF SERVICE

I hereby certify that on April 25, 2018, I electronically filed the aforesaid document(s) with the Clerk of the Court using the ECF system which will send notification of such filing to all parties of record in this case by operation of the Court's electronic filing system and/or U.S. Mail. Parties may access this filing through the Court's system.

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/s/ Michael J. Duffy