

IN THE CIRCUIT COURT
FOR THE SIXTH JUDICIAL CIRCUIT
DOUGLAS COUNTY, TUSCOLA, ILLINOIS

JOHN KRAFT)
)
 Plaintiff)
)
 v.)
)
 ARCOLA TOWNSHIP) 2014-MR-34
)
)
 Defendant.)

MOTION FOR PROTECTIVE ORDER PURSUANT TO S.C. RULE 201(c)(1)

COMES NOW Plaintiff, John Kraft, *pro se*, and prays this Court grant this Motion for Protective Order Pursuant to Supreme Court Rule 201(c)(1) and hereby states as follows:

1. Pursuant to Illinois Supreme Court Rule 201(c)(1), the Court may at any time *sua sponte* or upon motion of any party or witness enter a protective order to “*prevent unreasonable annoyance, expense, embarrassment, disadvantage, or oppression.*” A protective order may deny, limit, condition, or regulate discovery as the Court deems just.
2. Plaintiff in this cause is, John Kraft, *pro se*.
3. Defendant is the Township of Arcola.
4. Plaintiff received Defendant’s Request for Production of Documents on or about November 6, 2014. See Exhibit A.
5. Defendant’s Request for Production of Documents is flawed. Illinois Supreme Court Rule 214 states that: 1) any request must be calculated to lead to discovery

- of [documents] relevant to the subject matter of the action, and, 2) shall state the place and manner of making inspection or performance of the related acts.
6. Defendant's Request For Production Of Documents seeks documents that are 1) from parties not related to this action, and, 2) protected under the Reporter's Privilege and other doctrines, and, 3) is harassing, oppressive, irrelevant and immaterial to any issue in this action, not limited in time or to the State of Illinois, beyond the scope of permissible discovery, or readily available in the public domain or from Defendant's own records, and, 4) seeks information which is not reasonably calculated to lead to the discovery of admissible evidence at trial, and, 5) no place and manner of making inspection or performance of the related acts were specified (Supreme Court Rule 214(a)).
 7. Plaintiff considers all other requested documents to be "Discovery Abuse".

WHEREFORE Plaintiff prays this Court GRANT this Motion For Protective Order.

Signed and sworn before me
this ____ day of November, 2014

John Kraft
Plaintiff, *pro se*
7060 Illinois Highway 1
Paris, Illinois 61944
217-808-2527

IN THE CIRCUIT COURT
FOR THE SIXTH JUDICIAL CIRCUIT
TUSCOLA, DOUGLAS COUNTY, ILLINOIS

JOHN KRAFT,)	
)	
Plaintiff,)	
)	
vs.)	No. 2014-MR-34
)	
ARCOLA TOWNSHIP,)	
)	
Defendant.)	

REQUEST FOR PRODUCTION OF DOCUMENTS

TO: MR. JOHN KRAFT
7060 Illinois Highway 1
Paris, IL 61944

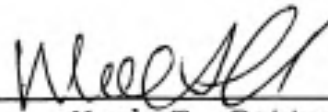
Pursuant to Supreme Court Rule 214, you are hereby requested to produce copies of the following described documents within 28 days of the receipt hereof:

1. Copies of any and all written documents, correspondence, emails, memoranda, bills, documents or other written information concerning the requests which are alleged in the Complaint, whether said documents are to the township or any other individual or entity. This includes letters, correspondence, emails and other written information to the Defendants or to the Edgar County Watchdogs, Inc. being sent by the Plaintiff or said Edgar County Watchdogs, Inc.

2. Copies of any and all written documents, information or other memoranda in your possession that substantiate, refer to or otherwise apply to or affect the allegation that the Plaintiff in this cause is "news media".

3. An Affidavit of Compliance in accordance with Supreme Court Rule 214 stating whether the production is complete in accordance with this Request.

DUTY TO SUPPLEMENT: A party has a duty to seasonably supplement any prior production of documents or information concerning the whereabouts of documents to the extent that documents subsequently come into that party's possession or control, or become known to that party, pursuant to Supreme Court Rule 214.



Mark T. Petty

Mark T. Petty
Petty Law Office, P.C.
111 East Main Street
P.O. Box 128
Arcola, IL 61910
Phone: 217-268-3056
Fax: 217-268-4898

IN THE CIRCUIT COURT
FOR THE SIXTH JUDICIAL CIRCUIT
TUSCOLA, DOUGLAS COUNTY, ILLINOIS

JOHN KRAFT,)
)
 Plaintiff,)
)
 vs.) No. 2014-MR-34
)
 ARCOLA TOWNSHIP,)
)
 Defendant.)

AFFIDAVIT OF COMPLIANCE WITH
REQUEST FOR PRODUCTION OF DOCUMENTS

I, the undersigned, do hereby certify that a copy of a Response to Request for Production of Documents and exact copies of documents produced by the Plaintiff, JOHN KRAFT, in response to said Response to Request for Production of Documents were mailed to the attorney for the Defendant. The Plaintiff further states that he has produced copies of any and all documents in his possession and to the best of his knowledge and belief, production is complete in accordance with said Request for Production of Documents.

JOHN KRAFT

Subscribed and sworn to before me
this ____ day of _____, 2014.

Notary Public

IN THE CIRCUIT COURT
FOR THE SIXTH JUDICIAL CIRCUIT
DOUGLAS COUNTY, TUSCOLA, ILLINOIS

JOHN KRAFT,

Plaintiff,

v.

ARCOLA TOWNSHIP,

Defendant.

Case Nos. 2014-MR-34

CERTIFICATE OF MAILING

I, the undersigned, under penalties of perjury as provided in the Code of Civil Procedure, do hereby certify that I served a true and exact copy of Request for Production of Documents upon the following individual and the attorney of record in the above-entitled cause by placing said copy in the United States mail at Arcola, Illinois on the 5th day of November, 2014 in an envelope securely sealed, with proper postage prepaid, and legibly addressed to:

MR. JOHN KRAFT
7060 Illinois Highway 1
Paris, IL 61944

The original Request for Production of Documents and was not filed with the Clerk of the Circuit Court, however this certificate was filed with the Clerk disclosing that copies were served as stated herein. The original Request for Production of Documents has been retained at the Petty Law Office, P.C., 111 E. Main Street, Arcola, Illinois 61910.



MARK T. PETTY

PETTY LAW OFFICE, P.C.
Attorney for Defendant
111 E. Main St.
P.O. Box 128
Arcola, IL 61910
Telephone: 217/268-3056
Fax: 217/268-4898

CERTIFICATE OF MAILING

I, the undersigned, under penalties of perjury as provided in the Code of Civil Procedure, do hereby certify that I mailed a true and exact copy of this MOTION FOR PROTECTIVE ORDER to the below stated individual(s); by placing the same properly addressed in the United States Mail at _____, Illinois, postage fully prepaid, on this _____ day of _____, 2014 in an envelope securely sealed, with proper postage prepaid, and legibly addressed:

Mr. Mark T. Petty
Petty Law Office, Inc.
111 E. Main St.
P.O. Box 128
Arcola, Illinois 61910

John Kraft
Plaintiff, *pro se*
7060 Illinois Highway 1
Paris, Illinois 61944
217-808-2527