

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

KIRK ALLEN,)
)
Plaintiff,)
)
v.) Case No. 14-MR-33
)
ARCOLA TOWNSHIP,)
)
Defendant.)

ANSWER TO COMPLAINT FOR DECLARATORY JUDGMENT
AND INJUNCTIVE RELIEF

COMES NOW the Defendant, ARCOLA TOWNSHIP, by its attorney, Mark T. Petty, and states the following for its Answer to Complaint for Declaratory Judgment and Injunctive Relief:

1. That the Defendant admits the allegations of paragraph 1.
2. That the Defendant admits the allegations of paragraph 2.
3. That the Defendant admits the allegations of paragraph 3.
4. That the Defendant admits that the letter was sent to the Plaintiff, but denies the remaining allegations of this paragraph 4.
5. That the Defendant denies the allegations of paragraph 5 and states affirmatively that the request includes a request for "notation on the requests that shows the computed day on which the period for response will expire," none of which are in existence.
6. That the Defendant denies the allegations of paragraph 6.
7. That the Defendant admits the allegations of paragraph 7.
8. That the Defendant denies the allegations of paragraph 8.

COUNT ONE

9. That the Defendant repeats and realleges its answers to

paragraph 1 through 8 above as its answer to this paragraph 9.

10. That the Defendant denies the allegations of paragraph 10.

11. That the Defendant denies the allegations of paragraph 11.

COUNT TWO

12. That the Defendant repeats and realleges its answers to paragraph 1 through 8 above as its answer to this paragraph 12.


13. That the Defendant denies the allegations of paragraph 13.

14. That the Defendant denies the allegations of paragraph 14.

WHEREFORE, the Defendant prays the Court to deny the relief sought by the Plaintiff and states affirmatively that there is no provision in the act authorizing the Court to require Affidavits executed by the Defendant or any other response and denies that there is any other allegation sufficient to support any civil penalty in this case.

ARCOLA TOWNSHIP, Defendant

By


Mark T. Petty, Its Attorney

Petty Law Office, P.C.
Attorney for Defendant
111 E. Main St.
P.O. Box 128
Arcola, IL 61910
Telephone: (217) 268-3056
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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 the foregoing instrument to the below stated individual; by placing the same properly addressed in the United States Mail at Arcola, Illinois, postage fully prepaid, on this 16th day of October, 2014 in an envelope securely sealed, with proper postage prepaid, and legibly addressed:

Ms. Yasmeen N. Baig
FRANK H. BYERS, II, LTD.
160 W. Main St.
Decatur, IL 62523


CAROL INGRAM