

IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT
WILL COUNTY, ILLINOIS

CYNTHIA BRZANA

Plaintiff,

v.

KATHLEEN KENNEDY, DONALD
NORTON, JOHN NORTON, AND
SARAH NORTON

Defendants.

Case No. 18 L 718

MOTION FOR DEFAULT JUDGMENT

NOW COMES Plaintiff, CYNTHIA BRZANA, by and through her attorney, Robert T. Hanlon of The Law Offices of Robert T. Hanlon & Associates P.C., and with her Motion for Default Judgment against Defendants, DONALD NORTON, JOHN NORTON AND SARAH NORTON, herein states as follows in support of said Motion for entry of a Default Judgment:

1. The First Amended Complaint was filed on January 14, 2019.
2. Service on all three named Defendants, DONALD NORTON, JOHN NORTON AND SARAH NORTON, was had on January 26, 2019, via service on JOHN NORTON. See Affidavits of Service for Donald Norton, John Norton and Sarah Norton attached hereto and incorporated herein as Group Exhibit A.
3. Defendant, JOHN NORTON, a white male over the age of eighteen (18), resides with both SARAH NORTON AND DONALD NORTON.
4. More than thirty (30) days have passed since Defendants, DONALD NORTON, JOHN NORTON AND SARAH NORTON, were served with a copy of the Summons and First Amended Complaint.

5. Defendants, DONALD NORTON, JOHN NORTON AND SARAH NORTON, had an obligation to answer or otherwise plead to the First Amended Complaint before February 26, 2019.

6. No Appearance or other pleading has been served upon Plaintiff's counsel in this case by Defendants, DONALD NORTON, JOHN NORTON OR SARAH NORTON.

7. However, a "Notice of Filing" for an Appearance for Defendant, JOHN NORTON, was filed on February 13, 2019. However, no actual Appearance was filed with the court at that time. See Notice of Filing attached hereto and incorporated herein as Exhibit B.

8. The "Notice of Filing" was signed by Attorney Joel Brown. In discussions with Attorney Brown he indicated that he intended to file his Appearance, but had not yet filed the Appearance. Nevertheless, the "Notice of Filing" indicates that he did, in fact, file an Appearance.

9. On March 20, 2019, upon the agreement of Attorney Joel Brown and Plaintiff's counsel, this Court granted Defendant, JOHN NORTON, seven (7) additional days to file an answer. Defendant, JOHN NORTON, failed to file an answer before the court's imposed deadline of March 27, 2019.

10. On April 3, 2019, Plaintiff's counsel contacted the office of the Clerk of the Circuit Court of Will County and was informed by the Clerk's office that no Appearance had been filed on behalf of Defendants, DONALD NORTON, JOHN NORTON OR SARAH NORTON, only the Notice of Filing referenced herein above had been filed. No other responsive pleadings had been filed at that time.

11. However, on April 4, 2019, Plaintiff's counsel again contacted the office of the Clerk of the Circuit Court of Will County and was informed by the Clerk's office that an

Appearance was filed on behalf of Defendant, JOHN NORTON, by Attorney Joel Brown on April 2, 2019, but that no answer or other pleading had been filed.

12. This case is predicated upon Defendants', DONALD NORTON'S, JOHN NORTON'S AND SARAH NORTON'S, malicious smear campaign to label Plaintiff as a "whore" and a "pedophile", when in fact the Plaintiff is neither a "whore" nor a "pedophile".

WHEREFORE, Plaintiff, CYNTHIA BRZANA, prays that this Honorable Court grant the relief sought in the First Amended Complaint for Slander Per Se and False Light Invasion of Privacy and Civil Conspiracy against Defendants, DONALD NORTON, JOHN NORTON AND SARAH NORTON, as follows:

- A. Award Plaintiff, CYNTHIA BRZANA, compensatory damages of \$1,000,000 against Defendants, DONALD NORTON, JOHN NORTON AND SARAH NORTON, jointly and severally;
- B. Award Plaintiff, CYNTHIA BRZANA, punitive damages in the amount of \$1,000,000 against Defendants, DONALD NORTON, JOHN NORTON AND SARAH NORTON, jointly and severally; and
- C. Enjoin Defendants, DONALD NORTON, JOHN NORTON AND SARAH NORTON, from making further false and disparaging statements concerning Plaintiff, CYNTHIA BRZANA, as being a 'whore' or "pedophile".

Respectfully submitted,

CYNTHIA BRZANA, Plaintiff.

By: /s/ Robert T. Hanlon

Robert T. Hanlon, One of Plaintiff's Attorneys

Robert T. Hanlon, ARDC #6286331
Attorney for Plaintiff
Law Offices of Robert T. Hanlon & Assoc., P.C.
131 East Calhoun Street
Woodstock, IL 60098
(815) 206-2200
(815) 206-6184 (Fax)

PROOF OF SERVICE

I, **Robert T. Hanlon**, an attorney, on oath, state that I served a copy of Plaintiff's *Motion for Default Judgment*, referenced above, upon the attorneys of record at their respective addresses, by depositing the same in the U.S. Mail with postage prepaid at the Woodstock, Illinois, U.S. Post Office, and via e-mail to Joel Brown at joel@reederbrownlaw.com and Scott Pyles at spyles@rcklawfirm.com on this 4th day of **April, 2019**. Service was also had by delivering a copy of this motion to Defendants, DONALD NORTON, JOHN NORTON & SARAH NORTON, by depositing the same in the U.S. Mail with postage prepaid at the Woodstock, Illinois, U.S. Post Office, in Woodstock, Illinois, on this 4th day of **April, 2019**, at the following addresses:

Donald Norton
1834 Roberts Street
Wilmington, IL 60481

John Norton.
1834 Roberts Street
Wilmington, IL 60481

Sarah Norton
1834 Roberts Street
Wilmington, IL 60481

/s/Robert T. Hanlon

Robert T. Hanlon, ARDC #6286331
Attorney for Plaintiff
Law Offices of Robert T. Hanlon & Assoc., P.C.
131 East Calhoun Street
Woodstock, IL 60098
(815) 206-2200
(815) 206-6184 (Fax)

Group Exhibit A

(Affidavits of Service
on Donald Norton, John
Norton and Sarah
Norton)

Case Number: 18L718

Plaintiff: Cynthia Buzana, Michael Esposito

Defendants: Donald Norton, John Norton, Sarah Norton, Kathleen Kennedy

Process Type: Summons - Requiring Appearance within 30 Days, First Amended Complaint for Slander per se and

Expiration Date: False Light invasion of privacy and civil conspiracy

February 15 - 2019

RESPONDENT TO BE SERVED

John Norton
1834 Robert St
Wilmington, IL 60481

AFFIDAVIT OF SERVICE

1-28-19-11:45 AM
2-8-19-11:45 AM
Andrea Lynn Chasteen
Will County Circuit Clerk
Twelfth Judicial Circuit Court
Electronically Filed
18L718
Filed Date: 2/16/2019 1:17 PM
Envelope: 3904384
Clerk: KA

I, the undersigned Richard Walden depose that I am above the age of eighteen, not a party to this action and do hereby certify that I have served the respondent by:

☒ INDIVIDUAL SERVICE by delivering to the within named respondent a copy of the process personally.

☐ SUBSTITUTE SERVICE by leaving a copy of this process at his/her usual place of abode with a person residing therein who is of the age of 13 years or upwards and informed that person of the contents thereof and that I further mailed a copy of this process in a sealed envelope with postage paid addressed to the defendant at his/her usual place of abode on _____

☐ CORPORATE, COMPANY, BUSINESS OR GOVERNMENT SERVICE by leaving a copy of this process with a person authorized to accept service and informed that person of the contents thereof.

☐ OTHER SERVICE: ☐ Certified Mail ☐ Posting - On said tenant a copy of the same on the main door of the within described premises, no one being in actual possession thereof.

ON FIRST EVENING ATTEMPT AFTER KNOCKING ON BACK DOOR OBSERVED A M/W MATCHING JOHN NORTON'S PHYSICAL DESCRIPTION, THIN BUILD, SANDY TO GRAYISH HAIR, GLASSES. LOOK OUT WINDOW I WAVED THEN ALL LIGHTS IN THE HOUSE WERE TURNED OFF ON 1-19-19 OBSERVE SAME M/W STANDING AT THE BACK DOOR AS I DROVE UP TO THE DRIVEWAY WHEN HE SAW ME HE WENT BACK INTO HOUSE AND CLOSED DOOR

Person to be served:

Serving address:

Process served on:

This 8 day of Feb, 2019

Relationship:

Sex M (M/F)

Race W

Age 50

Time: 6:10 AM/PM

SERVED BY:

PROCESS SERVER

STATE OF ILLINOIS DEPARTMENT OF REGISTRATION NUMBER:

LICENSE NUMBER / PERC NUMBER / DEPARTMENT I.D. NUMBER

Subscribed and sworn before me on this 9TH

day of FEBRUARY, 2019

Nancy J. Hall

Signature of Notary Public



IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT
WILL COUNTY, ILLINOIS

CYNTHIA BRZANA AND MICHAEL ESPOSITO,

Plaintiff

vs

KATHLEEN KENNEDY, DONALD NORTON, JOHN NORTON AND SARAH NORTON

Defendant

CASE NO. 18 L 718

SUMMONS – REQUIRING APPEARANCE WITHIN 30 DAYS AFTER SERVICE

To each defendant: JOHN NORTON,
1834 Robert Street, Wilmington, IL 60481

You are summoned and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance, in the office of the clerk of this court within thirty (30) days after service of this summons, not counting the day of service.

IF YOU FAIL TO DO SO, A JUDGMENT OR DECREE BY DEFAULT MAY BE TAKEN AGAINST YOU FOR THE RELIEF ASKED IN THE COMPLAINT.

E-filing is now mandatory for documents in civil cases with limited exemptions. To e-file, you must first create an account with an e-filing service provider. Visit <http://efile.illinoiscourts.gov/service-providers.htm> to learn more and to select a service provider. If you need additional help or have trouble e-filing, visit <http://www.illinoiscourts.gov/FAQ/gethelp.asp>, or talk with your local circuit clerk's office.

Please contact the Will County Circuit Clerk's Office, 14 W. Jefferson Street, Room 212, Joliet, IL 60432 by telephone (815)727-8592 or visit our website www.circuitclerkofwillcounty.com for more information.

To the Officer:

This summons must be returned by the officer or other person to whom it was given for service, with indorsement of service and fees, if any, immediately after service. If service cannot be made, this summons shall be returned so indorsed.

This summons may not be served later than thirty (30) days after its date.



WITNESS d January 15, 2019

Andrea Lynn Chasteen
ANDREA LYNN CHASTEEN
(Clerk of the Circuit Court)

Attorney or Party, if not represented by an attorney

Name Robert T. Hanlon

ARDC # 6286331

Firm Name Law Offices of Robert T. Hanlon & Assoc., P.C.

Attorney for Plaintiff

Address 131 East Calhoun Street

City & Zip Woodstock, IL 60098

Telephone (815) 208-2200

2-8-2019
(To be inserted by officer on the copy
left with the defendant or other person)

ANDREA LYNN CHASTEEN, CLERK OF THE CIRCUIT COURT OF WILL COUNTY

Case Number:

18L718

Plaintiff: Cynthia Brzana, Michael Esposito

Defendants: John Norton, Donald Norton, Sarah Norton, Kathleen Kennedy

Process Type: Summons - Requiring Appearance with in 30 day, First Amended

Expiration Date: Complaint for Slander per se and False Light Invasion of Privacy and Civil Conspiracy

February 15-2019

RESPONDENT TO BE SERVED

Donald Norton
1834 Robert St
Wilmington, IL, 60481

AFFIDAVIT OF SERVICE

FILED Date: 2/13/2019 1:17 PM

Envelope: 3904384
Clerk: KA

I, the undersigned Richard Walden depose that I am above the age of eighteen, not a party to this action and do hereby certify that I have served the respondent by:

INDIVIDUAL SERVICE by delivering to the within named respondent a copy of the process personally.

☒ SUBSTITUTE SERVICE by leaving a copy of this process at his/her usual place of abode with a person residing therein who is of the age of 13 years or upwards and informed that person of the contents thereof and that I further mailed a copy of this process in a sealed envelope with postage paid addressed to the defendant at his/her usual place of abode on

CORPORATE, COMPANY, BUSINESS OR GOVERNMENT SERVICE by leaving a copy of this process with a person authorized to accept service and informed that person of the contents thereof.

OTHER SERVICE: ☐ Certified Mail ☐ Posting - On said tenant a copy of the same on the main door of the within described premises, no one being in actual possession thereof.

NON-SERVICE: (Comments)

Person to be served:

Donald Norton

Serving address:

1834 Robert St Wilmington IL

Process served on:

John Norton

This 8 day of Feb, 2019

Relationship: Father

Sex: M (M/F)

Race: W

Age: 50's

Time: 6:10 AM/PM

SERVED BY: PROCESS SERVER

STATE OF ILLINOIS DEPARTMENT OF REGISTRATION NUMBER:

LICENSE NUMBER / PERC NUMBER / DEPARTMENT I.D. NUMBER

Subscribed and sworn before me on this

9TH

day of

FEBRUARY

2019

Nancy J. Hall

Signature of Notary Public

OFFICIAL SEAL
NANCY J. HALL
Notary Public - State of Illinois
My Commission Expires 1/04/2022

IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT
WILL COUNTY, ILLINOIS

CYNTHIA BRZANA AND MICHAEL ESPOSITO,

Plaintiff

VS

CASE NO. 18 L 718

KATHLEEN KENNEDY, DONALD NORTON, JOHN NORTON AND SARAH NORTON

Defendant

SUMMONS – REQUIRING APPEARANCE WITHIN 30 DAYS AFTER SERVICE

To each defendant: DONALD NORTON,

1834 Robert Street, Wilmington, IL 60481

You are summoned and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance, in the office of the clerk of this court within thirty (30) days after service of this summons, not counting the day of service.

IF YOU FAIL TO DO SO, A JUDGMENT OR DECREE BY DEFAULT MAY BE TAKEN AGAINST YOU FOR THE RELIEF ASKED IN THE COMPLAINT.

E-filing is now mandatory for documents in civil cases with limited exemptions. To e-file, you must first create an account with an e-filing service provider. Visit <http://efile.illinoiscourts.gov/service-providers.htm> to learn more and to select a service provider. If you need additional help or have trouble e-filing, visit <http://www.illinoiscourts.gov/FAQ/gethelp.asp>, or talk with your local circuit clerk's office.

Please contact the Will County Circuit Clerk's Office, 14 W. Jefferson Street, Room 212, Joliet, IL 60432 by telephone (815)727-8592 or visit our website www.circuitclerkofwillcounty.com for more information.

To the Officer:

This summons must be returned by the officer or other person to whom it was given for service, with indorsement of service and fees, if any, immediately after service. If service cannot be made, this summons shall be returned so indorsed.

This summons may not be served later than thirty (30) days after its date.



WITNESSd January 15, 2019

Andrea Lynn Chasteen

ANDREA LYNN CHASTEEN
(Clerk of the Circuit Court)

Attorney or Party, if not represented by an attorney

Name Robert T. Hanlon

ARDC # 0286331

Firm Name Law Offices of Robert T. Hanlon & Assoc., P.C.

Attorney for Plaintiff

Address 131 East Calhoun Street

City & Zip Woodstock, IL 60098

Telephone (815) 208-2200

2-8-2019
(To be inserted by officer on the copy
left with the defendant or other person)

ANDREA LYNN CHASTEEN, CLERK OF THE CIRCUIT COURT OF WILL COUNTY

Case Number:

18L718

Plaintiff: Cynthia Busana, Michaela Esposito

Defendants: Donald Norton, John Norton, Sarah Norton, Kathleen Kennedy

Process Type: Summons - Requiring Appearance

Expiration Date: Complaint for Slander per se and False Light Invasion of Privacy and Civil Conspiracy

February - 15 - 2019

RESPONDENT TO BE SERVED

Sarah Norton
1834 Robert St
Wilmington, IL, 60481

AFFIDAVIT OF SERVICE 1-25-19 - 1-26-19

1-28-19 11:45 AM
2-8-19 11:45 AM
Andrea Lynn Chasteen
Will County Clerk
Twelfth Judicial Circuit Court
Electronically Filed
18L718
Filed Date: 2/13/2019 1:17 PM
Envelope: 0904384
Clerk: KA

I, the undersigned Richard Walden depose that I am above the age of eighteen, not a party to this action and do hereby certify that I have served the respondent by:

☐ INDIVIDUAL SERVICE by delivering to the within named respondent a copy of the process personally.

☒ SUBSTITUTE SERVICE by leaving a copy of this process at his/her usual place of abode with a person residing therein who is of the age of 13 years or upwards and informed that person of the contents thereof and that I further mailed a copy of this process in a sealed envelope with postage paid addressed to the defendant at his/her usual place of abode on 2-8-19

☐ CORPORATE, COMPANY, BUSINESS OR GOVERNMENT SERVICE by leaving a copy of this process with a person authorized to accept service and informed that person of the contents thereof.

☐ OTHER SERVICE: ☐ Certified Mail ☐ Posting - On said tenant a copy of the same on the main door of the within described premises, no one being in actual possession thereof.

☐ NON-SERVICE: (Comments)

Person to be served:

Serving address:

Process served on:

This 8 day of Feb, 2019

Relationship: Father

Sex M (M/F)

Race W

Age 50s

Time: 6:10

AM/PM

SERVED BY: PROCESS SERVER

STATE OF ILLINOIS DEPARTMENT OF REGISTRATION NUMBER:

LICENSE NUMBER / PERC NUMBER / DEPARTMENT I.D. NUMBER

Subscribed and sworn before me on this

9TH

day of

FEBRUARY

2019

Nancy J. Hall
Signature of Notary Public

OFFICIAL SEAL
NANCY J. HALL
Notary Public - State of Illinois
My Commission Expires 1/04/2022

IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT
WILL COUNTY, ILLINOIS

CYNTHIA BRZANA AND MICHAEL ESPOSITO,

Plaintiff

VS

KATHLEEN KEENEY, DONALD NORTON, JOHN NORTON AND SARAH NORTON

Defendant

CASE NO. 18 L 718

SUMMONS - REQUIRING APPEARANCE WITHIN 30 DAYS AFTER SERVICE

To each defendant: SARAH NORTON,
1834 Robert Street, Wilmington, IL 60481

You are summoned and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance, in the office of the clerk of this court within thirty (30) days after service of this summons, not counting the day of service.

IF YOU FAIL TO DO SO, A JUDGMENT OR DECREE BY DEFAULT MAY BE TAKEN AGAINST YOU FOR THE RELIEF ASKED IN THE COMPLAINT.

E-filing is now mandatory for documents in civil cases with limited exemptions. To e-file, you must first create an account with an e-filing service provider. Visit <http://efile.illinoiscourts.gov/service-providers.htm> to learn more and to select a service provider. If you need additional help or have trouble e-filing, visit <http://www.illinoiscourts.gov/FAQ/gethelp.asp>, or talk with your local circuit clerk's office.

Please contact the Will County Circuit Clerk's Office, 14 W. Jefferson Street, Room 212, Joliet, IL 60432 by telephone (815)727-8592 or visit our website www.circuitclerkofwillcounty.com for more information.

To the Officer:

This summons must be returned by the officer or other person to whom it was given for service, with indorsement of service and fees, if any, immediately after service. If service cannot be made, this summons shall be returned so indorsed.

This summons may not be served later than thirty (30) days after its date.



WITNESSd January 15, 2019

Andrea Lynn Chasteen
ANDREA LYNN CHASTEEN
(Clerk of the Circuit Court)

Attorney or Party, if not represented by an attorney

Name Robert T. Hanlon

ARDC # 8286331

Firm Name Law Offices of Robert T. Hanlon & Assoc., P.C.

Attorney for Plaintiff

Address 131 East Calhoun Street

City & Zip Woodstock, IL 60098

Telephone (815) 206-2200

2-8, 2019
(To be inserted by officer on the copy left with the defendant or other person)

ANDREA LYNN CHASTEEN, CLERK OF THE CIRCUIT COURT OF WILL COUNTY

Exhibit B

STATE OF ILLINOIS)
) ss
COUNTY OF WILL)

Andrea Lynn Chasteen
Will County Circuit Clerk
Twelfth Judicial Circuit Court
Electronically Filed
18L718

Filed Date: 2/12/2019 12:00 AM
Envelope: 3891877
Clerk: KA

IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT
WILL COUNTY, ILLINOIS

CYNTHIA BRZANA
Plaintiff,

Vs.

JOHN NORTON
Defendant.

Case No. 18 L 718

NOTICE OF FILING

TO: ROBERT HANLON
ROBERT T HANLON & ASSOCIATES
3260 EXECUTIVE DRIVE
JOLIET, IL 60431

SCOTT PYLES
RATHBUN, CSERVENYAK & KOZOL, LLC
131 EAST CALHOUN STREET
WOODSTOCK, IL 60098

You are hereby notified that Joel P. Brown, of Reeder-Brown Law, 58 North Chicago Street, Suite 404, Joliet, IL 60432, attorneys for JOHN NORTON, did on February 12 2019, file with the Circuit Court of Will County, Twelfth Judicial Circuit of Illinois, at 14 West Jefferson, Joliet, Illinois, the following documents, copies of which are attached. APPEARANCE.

Joel P. Brown
Attorney for John Norton

CERTIFICATE OF DELIVERY

The undersigned hereby certifies under penalties of perjury as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, that the above notice and any attached pleadings were ☒ placed in the U.S. Mail properly addressed and mailed with first class postage prepaid, ☐ sent via messenger, ☐ sent via facsimile (____ pages, from the office of ____, sender's facsimile number ____, to recipient's facsimile number ____), to the party at the address set forth above on the 12 day of February, 2019, before the hour of 5:00 p.m.
Under Penalties provided by law, I certify that the statements set forth herein are true and correct

Adalie Kavanagh
Adalie Kavanagh
Date: February 12, 2019.

STATE OF ILLINOIS)
) ss
COUNTY OF WILL)

Andrea Lynn Chasteen
Will County Circuit Clerk
Twelfth Judicial Circuit Court
Electronically Filed
18L718

Filed Date: 2/12/2019 12:00 AM
Envelope: 3891877
Clerk: KA

IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT
WILL COUNTY, ILLINOIS

CYNTHIA BRZANA)
Plaintiff,)
Vs.)
JOHN NORTON)
Defendant.)

Case No. 18 L 718

NOTICE OF FILING

TO: ROBERT HANLON
ROBERT T HANLON & ASSOCIATES
3260 EXECUTIVE DRIVE
JOLIET, IL 60431

SCOTT PYLES
RATHBUN, CSERVENYAK & KOZOL, LLC
131 EAST CALHOUN STREET
WOODSTOCK, IL 60098

You are hereby notified that Joel P. Brown, of Reeder-Brown Law, 58 North Chicago Street, Suite 404, Joliet, IL 60432, attorneys for JOHN NORTON, did on February 12 2019, file with the Circuit Court of Will County, Twelfth Judicial Circuit of Illinois, at 14 West Jefferson, Joliet, Illinois, the following documents, copies of which are attached. APPEARANCE.

Joel P. Brown
Attorney for John Norton

CERTIFICATE OF DELIVERY

The undersigned hereby certifies under penalties of perjury as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, that the above notice and any attached pleadings were ☒ placed in the U.S. Mail properly addressed and mailed with first class postage prepaid, ☐ sent via messenger, ☐ sent via facsimile (___ pages, from the office of ___, sender's facsimile number ___, to recipient's facsimile number ___), to the party at the address set forth above on the 12 day of February, 2019, before the hour of 5:00 p.m.

Under Penalties provided by law, I certify that the statements set forth herein are true and correct

Adalie Kavanaugh
Adalie Kavanaugh
Date: February 12, 2019.