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

IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT For least 4/4/2019 4:28 PM WILL COUNTY, ILLINOIS

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C	le	rk:	JA	N

CYNTHIA BRZANA)	
Plaintiff,)	*
v.) Case No. 18 L 71	8
KATHLEEN KENNEDY, DONALD NORTON, JOHN NORTON, AND SARAH NORTON)	
Defendants.)	

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.

- 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: <u>/s/Robert T. Hanlon</u>
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@reklawfirm.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)

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

WILLCOOKII	LEDITOIS
CYNTHIA BRZANA AND MICHAEL ESPOSITO,	and the same of th
Plaintiff	
vs	(<)/
	CASE NO. 18 L 718
KATHLEEN KENNEDY, DONALD NORTON, JOHN NORTON AND SARAH HORTON	
Defendant	. (())
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 attached, or otherwise file your appearance, in the office of service of this summons, not counting the day of service. IF YOU FAIL TO DO SO, A JUDGMENT OR DECRITOR FOR THE RELIEF ASKED IN THE COMPLAIN	f the clerk of this court within thirty (30) days after EE BY DEFAULT MAY BE TAKEN AGAINST
E-filing is now mandatory for documents in civil cases create an account with an e-filing service provider. Visit he learn more and to select a service provider. If you need add http://www.illinoiscourts.gov/FAO/gethelp.asp, or talk with	ttp://efile.illindiscourts.gov/service-providers.htm to filtional help of have trouble e-filing, visit
Please contact the Will County Circuit Clerk's Office, by telephone (815)727-8592 or visit our website www.circ	4 W. Jefferson Street, Room 212, Joliet, IL 60432 uitelerkofwillcounty.com for more information.
To the Officer: This summons must be returned by the officer or other indorsement of service and fees, if any, immediately after shall be returned so indorsed.	person to whom it was given for service, with tervice. If service cannot be made, this summons
This summons may not be served later than thirty (30) days	s after its date.
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Attorney or Party, if not represented by an attorney Name Robert T. Hanton	v .
ARDC # 6286331	2-8-,2019
Firm Name Law Offices of Robert T. Hanlon & Assoc., P.C. Attorney for Raintiff	
Address 131 East Calhoun Street	(To be inserted by officer on the copy
City & Zip Woodstock, IL 60098	left with the defendant or other person)
Telephone (815)/208-2200	
ANDREA LYNN CHASTEEN, CLERK OF THE	CIRCUIT COURT OF WILL COUNTY
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IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT WILL COUNTY, ILLINOIS CYNTHIA BRZANA AND MICHAEL ESPOSITO. Plaintiff CASE NO. 18 L 718 KATHLEEN KENNEDY, DONALD NORTON, JOHN NORTON AND SARAH NORTON Defendant SUMMONS - REQUIRING APPEARANCE WITHIN 30 DAYS AFFER 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 hup://efile.illing/scourts.gov/service-providers.htm to learn more and to select a service provider. If you need additional tielp or have trouble e-filing, visit http://www.illinoiscourts.gov/FAO/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.circuitelerkofwillcounty.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 (Clerk of the Circuit Court) Attorney or Party, if not represented by an attorney Name Robert T. Hanton ARDC # 6286331 Firm Name Law Offices of Robert T. Hanlon & Assoc., P.C. Attorney for Plaintiti Address 131 Fast Calhoun Street (To be inserted by officer on the copy left with the defendant or other person) City & Zip Woodstock, IL 60098

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

Telephone (815) 208-2200

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

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CYNTHIA BRZANA AND MICHAEL ESPOSITO,	
Plaintiff	
Vs	404 740
WALL TO THE TAXABLE PARTY OF THE PARTY OF TH	CASE NO. 18 L 718
KATHLEEN KENNEDY, DONALD NORTON, JOHN NORTON AND SARAH NORTON	
Defendant	
SUMMONS - REQUIRING APPEAR	ANCE WITHIN 30 DAYS AFTER SERVICE
To each defendant: SARAH NORTON,	$((\ \))$
1834 Robert Street, Wilmington, iL	. 60481
attached, or otherwise file your appearance, in the service of this summons, not counting the day of so IF YOU FAIL TO DO SO, A JUDGMENT OR YOU FOR THE RELIEF ASKED IN THE COI	DECREE BY DEFAULT MAY BE TAKEN AGAINST WPLAINT. If cases with limited exemptions. To e-file, you must first Visit http://cfile.illinoiscourts.gov/service-providers.htm to
http://www.illinoiscourts.gov/FAQ/gethelp.asp, or	talk with your local circuit clerk's office.
Please contact the Will County Circuit Clerk's C	Office, 14 W. Jefferson Street, Room 212, Joliet, IL 60432 www.elrcultclerkofwillcounty.com for more information.
indorsement of service and fees, if any, immediated shall be returned so indorsed.	r other person to whom it was given for service, with y after service. If service cannot be made, this summons
This summons may not be served later than thirty (30) days after its date.
	WITNESS d January 16 , 2019 Sudhea Lynn Chapteer ANDREA LYNN CHASTEEN (Clerk of the Circuit Coun)
Attorney or Party, if not represented by an attorney Name Robert T. Hanton	1/1/18
ARDC # 6286331	To be inserted by officer on the conv
Firm Name Law Offices of Robert T. Hanlon & Assoc., P.C	(To be invested by afficient the conv
Attorney for Plaintiff	_ (10 be instituted) entitle top)
Address 131 East Calhoun Street	left with the defendant or other person)
City & Zip Woodslock, IL 60098	
Telephone (616) 206-2200	ON MATERIAL CONTROL CONTROL CONTROL
ANDREA LYNN CHASTEEN, CLERK C	OF THE CIRCUIT COURT OF WILL COUNTY
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Exhibit B

STATE OF ILLINOIS) ss COUNTY OF WILL) IN THE CIRCUIT COURT OF THE TWELFTH JUD WILL COUNTY, ILLINOIS	Andrea Lynn Chasteen Will County Circuit Clerk Twelfth Judicial Circuit Court Electronically Filed 18L718 Filed Date: 2/13/2019 12:00 AM Envelope: 3891877 Clerk: KA
CYNTHIA BRZANA Plaintiff, Case No. 18 L 718 Vs. JOHN NORTON Defendant.	
NOTICE OF FILING	
3260 EXECTUTIVE DRIVE JOLIET, IL 60431 131 EAST CAL WOODS TOOK	
You are hereby notified that Joel P. Brown, of Reeder-Brown I Suite 404, Joliet, IL 60432, attorneys for JOHN NORTON, did on I Circuit Court of Will County, Twelfth Judicial Circuit of Illinois, the following documents, copies of which are attached. All Attorney for John County of John Coun	nat 14 West Jefferson, Joliet, PPEARANCE.
CERTIFICATE OF DELIVERY The undersigned hereby certifies under penalties of perjury Section 1-109 of the Code of Civil Procedure, that the above notic were [X] placed in the U.S. Mail properly addressed and mailed wire least via messenger, [Sent via facsimile pages, from the off number, to recipient's facsimile number, to the party on the 12 day of, 2019, before the hour of 5:00 punder Penalties provided by law, I certify that the statements set for Adalie Kavana Date:February	th first class postage prepaid, [fice of, sender's facsimile of at the address set forth above o.m. orth herein are true and correct

Andrea Lynn Chasteen Will County Circuit Clerk STATE OF ILLINOIS S
IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT WILL COUNTY, ILLINOIS Envelope: 3891877 Clerk: KA
CYNTHIA BRZANA) Plaintiff,) Case No. 18 L 718 Vs.
JOHN NORTON) Defendant.
NOTICE OF FILING
TO: ROBERT HANLON ROBERT T HANLON & ASSOCIATES 3260 EXECTUTIVE DRIVE JOLIET, IL 60431 SCOTT PYLES RATHBUN, CSERVENYAK & KOZOL, LLC 131 EAST CALHOUN STREET WOODS TOOK, 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 Judigial Circuit of Illinois, at 14 West Jefferson, Joliet, Illinois, the following documents, copies of which are attached. APPEARANCE.
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 [X]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, sender's facsimile number, 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 Date: February 12, 2019.