

IN THE CIRCUIT COURT OF THE 12TH JUDICIAL CIRCUIT
WILL COUNTY, ILLINOIS

CYNTHIA BRZANA)
Plaintiff,)
)
v.)
)
KATHLEEN KENNEDY, DONALD)
NORTON, JOHN NORTON, AND)
SARAH NORTON,)
Defendants)

Case No. 18 L 718

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**FIRST AMENDED COMPLAINT FOR SLANDER PER SE, AND FALSE LIGHT
INVASION OF PRIVACY AND CIVIL CONSPIRACY**

NOW COMES John Norton, Defendant, by and through Joel P. Brown, of Reeder & Brown, P.C., and as an Answer to the First Amended Complaint for Slander Per Se, And False Light Invasion of Privacy and Civil Conspiracy, states as follows:

PARTIES AND VENUE.

- 1) Defendants admit the allegations in paragraph 1.
- 2) Defendants admit the allegations in paragraph 2.
- 3) Defendants admit the allegations in paragraph 3.
- 4) Defendants admit the allegations in paragraph 4.
- 5) Defendants admit the allegations in paragraph 5.

FACTS COMMON TO EACH COUNT.

- 6) Defendants are unable to admit or deny the allegations in paragraph 6.
- 7) Defendants are unable to admit or deny the allegations in paragraph 7.
- 8) Defendants are unable to admit or deny the allegations in paragraph 8.
- 9) Defendants are unable to admit or deny the allegations in paragraph 9.
- 10) Defendants deny the allegations in paragraph 10.
- 11) Defendants deny the allegations in paragraph 11.

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- 12) Defendants admit the allegations in paragraph 12.
- 13) Defendants deny the allegations in paragraph 13.
- 14) Defendants deny the allegations in paragraph 14.
- 15) Defendants are unable to admit or deny the allegations in paragraph 15.
- 16) Defendants are unable to admit or deny the allegations in paragraph 16.
 - a. Defendants are unable to admit or deny the allegations in section a.
 - b. Defendants are unable to admit or deny the allegations in section b.
 - c. Defendants are unable to admit or deny the allegations in section c.
 - d. Defendants are unable to admit or deny the allegations in section d.
- 17) Defendants are unable to admit or deny the allegations in paragraph 17.
- 18) Defendants are unable to admit or deny the allegations in paragraph 18.
- 19) Defendants are unable to admit or deny the allegations in paragraph 19.
- 20) Defendants are unable to admit or deny the allegations in paragraph 20.
- 21) Defendants are unable to admit or deny the allegations in paragraph 21.
- 22) Defendants are unable to admit or deny the allegations in paragraph 22.
- 23) Defendants are unable to admit or deny the allegations in paragraph 23.
- 24) Defendants are unable to admit or deny the allegations in paragraph 24.
- 25) Defendants admit the allegations in paragraph 25.
- 26) Defendants admit the allegations in paragraph 26.
- 27) Defendants deny the allegations in paragraph 27.
- 28) Defendants are unable to admit or deny the allegations in paragraph 28.
- 29) Defendants are unable to admit or deny the allegations in paragraph 29.
- 30) Defendants deny the allegations in paragraph 30.
- 31) Defendants deny the allegations in paragraph 31.
- 32) Defendants admit the allegations in paragraph 32.
- 33) MISSING
- 34) MISSING
- 35) MISSING
- 36) Defendants deny the allegations in paragraph 36.
- 37) Defendants deny the allegations in paragraph 37.
- 38) MISSING

- 39) Defendants are unable to admit or deny the allegations in paragraph 39.
- 40) Defendants deny the allegations in paragraph 40.
- 41) Defendants deny the allegations in paragraph 41.
- 42) Defendants are unable to admit or deny the allegations in paragraph 42.
- 43) Defendants deny the allegations in paragraph 43.
- 44) Defendants are unable to admit or deny the allegations in paragraph 44.
- 45) Defendants deny the allegations in paragraph 45.
- 46) Defendants deny the allegations in paragraph 46.

COUNT I FALSE LIGHT INVASION OF PRIVACY
(BRZANA V ALL NAMES DEFENDANTS)

- 47) Defendant restates his answers for paragraph 1-47.
- 48) Defendants deny the allegations in paragraph 48.
- 49) Defendants deny the allegations in paragraph 49.
- 50) Defendants are unable to admit or deny the allegations in paragraph 50.
- 51) Defendants deny the allegations in paragraph 51.
- 52) Defendants are unable to admit or deny the allegations in paragraph 52.
- 53) Defendants are unable to admit or deny the allegations in paragraph 53.
- 54) Defendants are unable to admit or deny the allegations in paragraph 54.
- 55) Defendants deny the allegations in paragraph 55.
- 56) Defendants are unable to admit or deny the allegations in paragraph 56.
- 57) Defendants deny the allegations in paragraph 57.

COUNT II SLANDER PER SE
(BRZANA V ALL NAMED DEFENDANTS)

- 58) Defendant restates his answers in paragraphs 1-57.
- 59) Defendants are unable to admit or deny the allegations in paragraph 59.
- 60) Defendants are unable to admit or deny the allegations in paragraph 60.
- 61) Defendants are unable to admit or deny the allegations in paragraph 61.

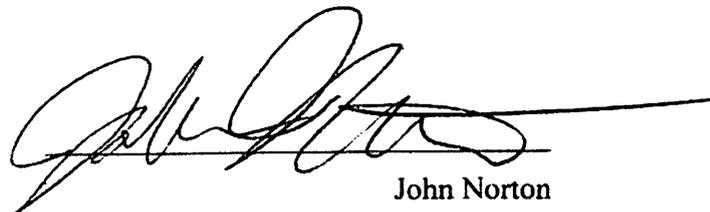
- 62) Defendants are unable to admit or deny the allegations in paragraph 62.
63) Defendants are unable to admit or deny the allegations in paragraph 63.
64) Defendants are unable to admit or deny the allegations in paragraph 64.
65) Defendants are unable to admit or deny the allegations in paragraph 65.

COUNT III LIABLE PER SE
(BRZANA V ALL NAMED DEFENDANTS)

- 66) Defendant is unable to admit or deny the allegations in paragraph 66.
67) Defendant is unable to admit or deny the allegations in paragraph 67.
68) Defendants deny the allegations in paragraph 68.
69) Defendants are unable to admit or deny the allegations in paragraph 69.
70) Defendants are unable to admit or deny the allegations in paragraph 70.
71) Defendants are unable to admit or deny the allegations in paragraph 71.
72) Defendants are unable to admit or deny the allegations in paragraph 72.

COUNT IV
(CIVIL CONSPIRACY)
(BRZANA V ALL NAMED DEFENDANTS)

- 73) Defendant is unable to admit or deny the allegations in paragraph 73.
74) Defendants deny the allegations in paragraph 74.
75) Defendants deny the allegations in paragraph 75.
76) Defendants deny the allegations in paragraph 76.


John Norton

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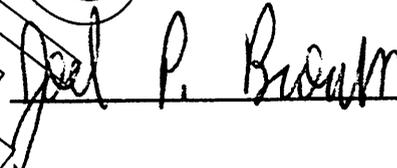
VERIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedures, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.



CERTIFICATION OF COUNSEL

I, JOEL P. BROWN, state that I am an attorney duly licensed to practice law in the State of Illinois, and that I represent the party who signed the foregoing pleading and that to the best of my knowledge, information and belief, formed after reasonable inquiry of my client, said pleading is well grounded in fact and warranted by existing law. I further certify that such pleading is not interposed for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the costs of litigation.



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