

LAWYER IT

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2020 JUL 27 AM 9:36
CIRCUIT COURT
WILL COUNTY, ILLINOIS

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Forsythe v Norton 19 OP 1740

Rob Hanlon <Rob.Hanlon@swccp.com>
Tue 6/30/2020 3:56 PM
To: NSLYE [REDACTED]

Mr. Norton:

Although 740 ILCS 21/1 et seq and Rule 137 do not require that I afford you a safe harbor as would be the case under the federal rules, I am offering to allow you to withdraw your specious "Emergency Motion for Order to Vacate Order of Protection" without risk of my fees. If you wish to take me up on this offer, all you need to do is alert me by e-mail of your intent to withdraw the pending motion to vacate, and I will prepare the proper order for submission to the court. This offer automatically expires on 12:01am Thursday, July 2, 2020.

You will also note the e-mail below contains the response to your motion to vacate. This is the response you represented to the court was not provided to you in our last court session.

Nothing contained herein is to grant you any safe harbor for any other case other than case identified by the number 19 OP 1740.

As you know, I filed with the Court a Petition for Rule to Show Cause in the matter of Norton v McCubbin et al. your response is past due and you are obligated by court order to have responded to those motions. I will not be inclined to agree to any extension as you have had months to respond and you have failed to respond. Moreover, nothing in this communication is intended to offer you any relief related to that case and the pending motion in that case.

Robert T. Hanlon
[REDACTED]

This email message and any attachments are confidential and may be protected by the attorney/client or other applicable privileges. The information is intended to be conveyed only to the designated recipient(s) of the message. If you are not an intended recipient, please notify the sender immediately and delete the message from your email system. Unauthorized use, dissemination, distribution or reproduction of this message by other than the intended recipient is strictly prohibited and may be unlawful. Thank you.

From: Rob Hanlon
Sent: Tuesday, June 23, 2020 4:27 PM
To: NSLYE [REDACTED]
Subject: Response to Motion to vacate

Mr. Norton:

Please find attached the Petitioner's response to your Motion to Vacate. You have my permission to withdraw your motion and I will waive my attorney fees. However, absent your withdraw, I will ask the court to tax my fees upon you. You may consider this letter a Safe harbor letter up to the time I endeavor to do any more work on this case.

Robert T. Hanlon
[REDACTED]

This email message and any attachments are confidential and may be protected by the attorney/client or other applicable privileges. The information is intended to be conveyed only to the designated recipient(s) of the message. If you are not an intended recipient, please notify the sender immediately and delete the message from your email system. Unauthorized use, dissemination, distribution or reproduction of this message by other than the intended recipient is strictly prohibited and may be unlawful. Thank you.

Upgrade to Microsoft 365 with premium Outlook features

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- 19L943
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- IBID
- LOTW
- Radio
- Roads
- Rollie
- Sarah
- Saved
- WTW
- Yahoo

STATE OF ILLINOIS,
CIRCUIT COURT

COUNTY _____

**CERTIFICATION FOR EXEMPTION
FROM E-FILING**

For Court Use Only

FILED

2820 JUL 27 AM 9:37

CIRCUIT COURT
WALL COUNTY, ILLINOIS

190P1740
Case Number

Instructions

Directly above, enter the name of the county where the case was filed.

Enter the name of the person who started the lawsuit as Plaintiff/Petitioner.

Enter the name of the person being sued as Defendant/Respondent.

Enter the Case Number given by the Circuit Clerk or leave this blank if you do not have one.

CONNIE FORD SYTHE
Plaintiff / Petitioner (First, middle, last name)

v.

JOHN NORTON
Defendant / Respondent (First, middle, last name)

In 1, check the reasons you are asking to file by mail or in person. You should check all that apply.

You are exempt from e-filing and you do not need to file this Certification if:

- you are in jail or prison;
- you are filing a will;
- you are filing into a juvenile case; OR
- your disability prevents you from e-filing.

1. I am not able to e-file documents in this case for the following reasons (check all that apply):

I am representing myself and do not have the internet or a computer in my home. My only access is through a public terminal at a courthouse, library, or other location. This poses a financial or other hardship.

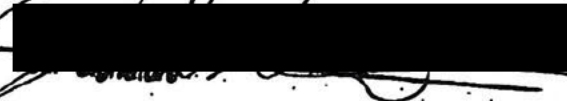
I am representing myself and have trouble reading, writing, or speaking in English.

I am filing a document in a sensitive case, such as a petition for an order of protection or a civil no contact/stalking order.

Due to safety concerns with COVID-19

2. Illinois Supreme Court Rule 8(c)(5) allows for an exemption from e-filing for good cause. For the above reasons, I need a good cause exemption from e-filing for my entire case or until I am able to e-file.

I certify that everything in the Certification for Exemption from E-filing is true and correct. I understand that making a false statement on this form is perjury and has penalties provided by law under 735 ILCS 5/1-109.



Print Your Name _____

Street Address _____

City, State, ZIP _____

Telephone _____

Under the Code of Civil Procedure, 735 ILCS 5/1-109, making a statement on this form that you know to be false is perjury, a Class 3 Felony.

After you finish this form, sign and print your name.

Enter your complete address and telephone number.

IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL
CIRCUIT

WILL COUNTY, ILLINOIS

FILED
2020 JUL 27 AM 9:36
12TH JUDICIAL CIRCUIT COURT
WILL COUNTY, ILLINOIS

Connie Forsythe,)

Petitioner,)

v.)

John Norton)

Respondent)

Case: 19 OP 1740

**AMENDED MOTION
FOR ORDER OF CONTEMPT
OF COURT**

**NOW COMES Respondent, JOHN NORTON, to bring this MOTION,
and, in support of his MOTION, NORTON states as follows:**

**A: that this AMENDED MOTION FOR ORDER is being filed to correct
two (2) errors were introduced in the original filing;**

I: the time and date of such hearing;

**ii: the attachment (Exhibit A) failed to scan into the system due to
an unknown system failure;**

**1: that on 29 June 2020, the Honorable Judge Tom Carney issued an Order
that grants Petitioner Forsythe seven (7) days to respond to Respondent
Norton's Order to Vacate Order via e-mail;**

**2: that the Respondent did receive an e-mail from Petitioner's attorney, but
DID NOT contain an attachment, copy, and/or facsimile there of, of any
such response as so ordered;**

3: that attached to this motion is a copy of the aforementioned e-mail (Exhibit A);

4: that prior to 29 June 2020, the Petitioner's attorney was never given the Respondent's e-mail address until ordered to provide it on that day;

5: that due to MULTIPLE grammar/spelling errors and poor sentence structure, any reasonable person would have difficulty in determining the content and meaning of the message;

6: that attorney HANLON attempts to "muddle the message" by including content referring to a separate case (19L943) that has no bearing on this case;

7: that it is upon information and belief that attorney HANLON is attempting to further delay action in this case, by failing to propagate to the Respondent the required documentation, thus denying the Respondents right to DUE PROCESS, to which the Respondent's response is "Justice Delayed Is Justice Denied";

8: that the Respondent retains receipts from the US Postal Service of the Time, Date and Amount of Postage of ALL documents propagated to attorney HANLON and is willing and able to present in open court the ORIGINAL documents;

9: that attorney HANLON has failed to provide to this Honorable Court any and all such relevant documents to support his claim that he propagated such documents to the Respondent;

WHEREAS;

10: The Respondent respectfully requests an ORDER OF CONTEMP OF COURT against attorney HANLON;

11: That Respondent Norton have such other or further relief as this Court deems just, equitable or necessary;

12: For any other relief this Honorable Court deems just, equitable or necessary.

RESPECTFULLY SUBMITTED,

/SS/ JOHN NORTON

07/27/20 03:54:17 CH

STATE OF ILLINOIS, CIRCUIT COURT Will _____ COUNTY	AMENDED NOTICE OF COURT DATE FOR MOTION	For Court Use Only FILED 2020 JUL 27 AM 9:36 19th CIRCUIT COURT WILL COUNTY, ILLINOIS _____ 19 OP 1740 Case Number
Instructions ▼ Directly above, enter the name of the county where the case was filed. Enter the name of the person who started the lawsuit as Plaintiff/Petitioner. Enter the name of the person being sued as Defendant/Respondent. Enter the Case Number given by the Circuit Clerk.	Connie Forsythe <u>Plaintiff / Petitioner (First, middle, last name)</u> v. John Norton <u>Defendant / Respondent (First, middle, last name)</u>	

In 1a, enter the date and time of your hearing.
 The Circuit Clerk will give you the date and time of the hearing when you file your Motion.

In 1b, also enter the address of the court and court room number for the hearing.

1. Hearing Information

The reasons for this hearing are listed in the attached papers called *Motion*.

The hearing for the *Motion* I filed is scheduled for:

- a. Date: July 29, 20 20 Time: 09:00 a.m. p.m.
- b. Address: 14 West Jefferson St Joliet IL 60432
Street City State ZIP
 Courtroom: 100

Under the Code of Civil Procedure, 735 ILCS 5/1-109, making a statement on this form that you know to be false is perjury, a Class 3 Felony.

If you are completing this form on a computer, sign your name by typing it. If you are completing it by hand, sign and print your name.

Enter your complete current address and telephone number.

I certify that everything in the Notice of Court Date for Motion is true and correct. I understand that making a false statement on this form is perjury and has penalties provided by law under 735 ILCS 5/1-109.

/s/ John Norton _____
 Your Signature Street Address

John Norton _____
 Print Your Name Wilmington, IL 60481
 City, State, ZIP

_____ _____
 Telephone

PROOF OF DELIVERY

In 1a, enter the name, mailing address, and email address of the party or lawyer to whom you sent the document.

In 1b, check the box to show how you sent the document, and fill in any other information required on the blank lines.

CAUTION: If the other party does not have a lawyer, you may send the document by email only if the other party has listed their email address on a court document.

In c, fill in the date and time that you sent the document.

In 2, if you sent the document to more than 1 party or lawyer, fill in a, b, and c. Otherwise leave 2 blank.

1. I sent this document:

a. To:

Name: Robert Hanlon

First Middle Last

Address: [REDACTED]

Street, Apt # City State ZIP

Email address: _____

b. By: Personal hand delivery

Regular, First-Class Mail, put into the U.S. Mail with postage paid at:
301 N Water St Wilmington, IL 60481

Address of Post Office or Mailbox

Third-party commercial carrier, with delivery paid for at:

Name (for example, FedEx or UPS) and office address

The court's electronic filing manager (EFM) or an approved electronic filing service provider (EFSP)

Email (not through an EFM or EFSP)

Mail from a prison or jail at:

Name of prison or jail

c. On: July 25, 2020

Date

At: 5:00 a.m. p.m.

Time

2. I sent this document:

a. To:

Name: _____

First Middle Last

Address: _____

Street, Apt # City State ZIP

Email address: _____

b. By: Personal hand delivery

Regular, First-Class Mail, put into the U.S. Mail with postage paid at:

Address of Post Office or Mailbox

Third-party commercial carrier, with delivery paid for at:

Name (for example, FedEx or UPS) and office address

The court's electronic filing manager (EFM) or an approved electronic filing service provider (EFSP)

Email (not through an EFM or EFSP)

Mail from a prison or jail at:

Name of prison or jail

c. On: _____
Date

At: _____ a.m. p.m.
Time

In 3, if you sent the document to more than 2 parties or lawyers, fill in a, b, and c. Otherwise leave 3 blank.

3. I sent this document:

a. To:
Name: _____
First Middle Last
Address: _____
Street, Apt # City State ZIP
Email address: _____

b. By: Personal hand delivery
 Regular, First-Class Mail, put into the U.S. Mail with postage paid at:

Address of Post Office or Mailbox
 Third-party commercial carrier, with delivery paid for at:

Name (for example, FedEx or UPS) and office address
 The court's electronic filing manager (EFM) or an approved electronic filing service provider (EFSP)
 Email (not through an EFM or EFSP)
 Mail from a prison or jail at:

Name of prison or jail

c. On: _____
Date

At: _____ a.m. p.m.
Time

If you sent your document to more than 3 parties or lawyers, check the box and file the *Additional Proof of Delivery* form with this form.

I have completed an *Additional Proof of Delivery* form.

Under the Code of Civil Procedure, 735 ILCS 5/1-109, making a statement on this form that you know to be false is perjury, a Class 3 Felony.

I certify that everything in the Proof of Delivery is true and correct. I understand that making a false statement on this form is perjury and has penalties provided by law under 735 ILCS 5/1-109.

/s/ John Norton
Your Signature

Street Address

John Norton
Print Your Name

Wilmington, IL 60481
City, State, ZIP

Telephone

If you are completing this form on a computer, sign your name by typing it. If you are completing it by hand, sign and print your name.

STATE OF ILLINOIS,
CIRCUIT COURT

COUNTY

CERTIFICATION FOR EXEMPTION
FROM E-FILING

For Court Use Only

FILED

2020 JUL 24 AM 9:27

WILL COUNTY, ILLINOIS

Instructions

Directly above, enter the name of the county where the case was filed.

Enter the name of the person who started the lawsuit as Plaintiff/Petitioner.

Enter the name of the person being sued as Defendant/Respondent

Enter the Case Number given by the Circuit Clerk or leave this blank if you do not have one.

CONNIE FORSYTHE
Plaintiff / Petitioner (First, middle, last name)

v.

JOHN NORTON
Defendant / Respondent (First, middle, last name)

1901740
Case Number

In 1, check the reasons you are asking to file by mail or in person. You should check all that apply.

You are exempt from e-filing and you do not need to file this Certification if:

- you are in jail or prison;
- you are filing a will;
- you are filing into a juvenile case; OR
- your disability prevents you from e-filing.

1. I am not able to e-file documents in this case for the following reasons (check all that apply):

- I am representing myself and do not have the internet or a computer in my home. My only access is through a public terminal at a courthouse, library, or other location. This poses a financial or other hardship.
- I am representing myself and have trouble reading, writing, or speaking in English.
- I am filing a document in a sensitive case, such as a petition for an order of protection or a civil no contact/stalking order.
- Due to safety concerns with COVID-19

2. Illinois Supreme Court Rule 8(c)(6) allows for an exemption from e-filing for good cause. For the above reasons, I need a good cause exemption from e-filing for my entire case or until I am able to e-file.

I certify that everything in the Certification for Exemption from E-filing is true and correct. I understand that making a false statement on this form is perjury and has penalties provided by law under 735 ILCS 5/1-109.

Your Signature

Print Your Name

Street Address

City, State, ZIP

Telephone

Under the Code of Civil Procedure, 735 ILCS 5/1-109, making a statement on this form that you know to be false is perjury, a Class 3 Felony.

After you finish this form, sign and print our name.

Enter your complete address and telephone number.

STATE OF ILLINOIS, CIRCUIT COURT Will _____ COUNTY	NOTICE OF COURT DATE FOR MOTION	For Court Use Only FILED 2020 JUL 24 AM 9:27 CLERK. CIRCUIT COURT WILL COUNTY, ILLINOIS 19 OP 1740 Case Number
Instructions ▼ Directly above, enter the name of the county where the case was filed. Enter the name of the person who started the lawsuit as Plaintiff/Petitioner. Enter the name of the person being sued as Defendant/Respondent. Enter the Case Number given by the Circuit Clerk.	Connie Forsythe <u>Plaintiff / Petitioner (First, middle, last name)</u> v. John Norton <u>Defendant / Respondent (First, middle, last name)</u>	

In 1a, enter the date and time of your hearing.
 The Circuit Clerk will give you the date and time of the hearing when you file your Motion.

In 1b, also enter the address of the court and court room number for the hearing.

1. Hearing Information

The reasons for this hearing are listed in the attached papers called *Motion*.

The hearing for the *Motion* I filed is scheduled for:

a. Date: July 29, 20 20 Time: 10:30 a.m. p.m.

b. Address: 14 West Jefferson St Joliet IL 60432
Street City State ZIP

Courtroom: 100

Under the Code of Civil Procedure, 735 ILCS 5/1-109, making a statement on this form that you know to be false is perjury, a Class 3 Felony.

If you are completing this form on a computer, sign your name by typing it. If you are completing it by hand, sign and print your name.

Enter your complete current address and telephone number.

I certify that everything in the *Notice of Court Date for Motion* is true and correct. I understand that making a false statement on this form is perjury and has penalties provided by law under 735 ILCS 5/1-109.

/s/ John Norton
 Your Signature

[Redacted]
 Street Address

John Norton
 Print Your Name

Wilmington, IL 60481
 City, State, ZIP

[Redacted]
 Telephone

PROOF OF DELIVERY

In 1a, enter the name, mailing address, and email address of the party or lawyer to whom you sent the document.

In 1b, check the box to show how you sent the document, and fill in any other information required on the blank lines.

CAUTION: If the other party does not have a lawyer, you may send the document by email only if the other party has listed their email address on a court document.

In c, fill in the date and time that you sent the document.

In 2, if you sent the document to more than 1 party or lawyer, fill in a, b, and c. Otherwise leave 2 blank.

1. I sent this document:

a. To:
 Name: Robert Hanlon
First Middle Last
 Address: [REDACTED]
Street, Apt # City State ZIP
 Email address: _____

b. By: Personal hand delivery
 Regular, First-Class Mail, put into the U.S. Mail with postage paid at:
301 N Water St Wilmington, IL 60481
Address of Post Office or Mailbox
 Third-party commercial carrier, with delivery paid for at:

Name (for example, FedEx or UPS) and office address
 The court's electronic filing manager (EFM) or an approved electronic filing service provider (EFSP)
 Email (not through an EFM or EFSP)
 Mail from a prison or jail at:

Name of prison or jail

c. On: July 25, 2020
Date
 At: 5:00 a.m. p.m.
Time

2. I sent this document:

a. To:
 Name: _____
First Middle Last
 Address: _____
Street, Apt # City State ZIP
 Email address: _____

b. By: Personal hand delivery
 Regular, First-Class Mail, put into the U.S. Mail with postage paid at:

Address of Post Office or Mailbox
 Third-party commercial carrier, with delivery paid for at:

Name (for example, FedEx or UPS) and office address
 The court's electronic filing manager (EFM) or an approved electronic filing service provider (EFSP)
 Email (not through an EFM or EFSP)
 Mail from a prison or jail at:

Name of prison or jail

c. On: _____
Date

At: _____ a.m. p.m.
Time

In 3, if you sent the document to more than 2 parties or lawyers, fill in a, b, and c. Otherwise leave 3 blank.

3. I sent this document:

a. To:
Name: _____
First Middle Last
Address: _____
Street, Apt # City State ZIP
Email address: _____

b. By: Personal hand delivery
 Regular, First-Class Mail, put into the U.S. Mail with postage paid at:

Address of Post Office or Mailbox
 Third-party commercial carrier, with delivery paid for at:

Name (for example, FedEx or UPS) and office address
 The court's electronic filing manager (EFM) or an approved electronic filing service provider (EFSP)
 Email (not through an EFM or EFSP)
 Mail from a prison or jail at:

Name of prison or jail

c. On: _____
Date

At: _____ a.m. p.m.
Time

If you sent your document to more than 3 parties or lawyers, check the box and file the *Additional Proof of Delivery* form with this form.

I have completed an *Additional Proof of Delivery* form.

Under the Code of Civil Procedure, 735 ILCS 5/1-109, making a statement on this form that you know to be false is perjury, a Class 3 Felony.

I certify that everything in the Proof of Delivery is true and correct. I understand that making a false statement on this form is perjury and has penalties provided by law under 735 ILCS 5/1-109.

/s/ John Norton
Your Signature

Street Address

John Norton
Print Your Name

Wilmington, IL 60481
City, State, ZIP

If you are completing this form on a computer, sign your name by typing it. If you are completing it by hand, sign and print your name.

Telephone

**IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL
CIRCUIT**

WILL COUNTY, ILLINOIS

Connie Forsythe,)
)
Petitioner,)
)
v.)
)
John Norton)
)
Respondent)

Case: 19 OP 1740

FILED
2020 JUL 24 AM 9:27
WILL COUNTY, ILLINOIS

**MOTION
FOR ORDER OF CONTEMPT
OF COURT**

**NOW COMES Respondent, JOHN NORTON, to bring this MOTION,
and, in support of his MOTION, NORTON states as follows:**

- 1: that on 29 June 2020, the Honorable Judge Tom Carney issued an Order that grants Petitioner Forsythe seven (7) days to respond to Respondent Norton's Order to Vacate Order via e-mail;**
- 2: that the Respondent did receive an e-mail from Petitioner's attorney, but DID NOT contain an attachment, copy, and/or facsimile there of, of any such response as so ordered;**
- 3: that attached to this motion is a copy of the aforementioned e-mail (Exhibit A);**
- 4: that prior to 29 June 2020, the Petitioner's attorney was never given the Respondent's e-mail address until ordered to provide it on that day;**
- 5: that due to MULTIPLE grammar/spelling errors and poor sentence structure, any reasonable person would have difficulty in determining**

the content and meaning of the message:

6: that attorney HANLON attempts to “muddle the message” by including content referring to a separate case (19L943) that has no bearing on this case;

7: that it is upon information and belief that attorney HANLON is attempting to further delay action in this case, by failing to propagate to the Respondent the required documentation, thus denying the Respondents right to DUE PROCESS, to which the Respondent’s response is “Justice Delayed Is Justice Denied”;

8: that the Respondent retains receipts from the US Postal Service of the Time, Date and Amount of Postage of ALL documents propagated to attorney HANLON and is willing and able to present in open court the ORIGINAL documents;

9: that attorney HANLON has failed to provide to this Honorable Court any and all such relevant documents to support his claim that he propagated such documents to the Respondent;

WHEREAS;

10: The Respondent respectfully requests an ORDER OF CONTEMP OF COURT against attorney HANLON;

11: That Respondent Norton have such other or further relief as this Court deems just, equitable or necessary;

12: For any other relief this Honorable Court deems just, equitable or necessary.

RESPECTFULLY SUBMITTED,

/SS/ JOHN NORTON

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

FILED
2019 JUN 29 AM 11:57
CLERK OF THE CIRCUIT COURT
WILL COUNTY ILLINOIS

Forsythe, Connie
Plaintiff

VS

John Norton
Defendant

CASE NO: 2019 OP 1740

COURT ORDER

This cause coming on to be heard on
presentation of John Norton's "Emergency Motion
for Order to Vacate Order of Protection" the
Court fully advised in the premises, It is ordered;

- 1) Petitioner, Connie Forsythe, granted 7 days to
file reply and send to N9LYE@hotmail.com
- 2) Respondent, Movant, John Norton granted 7 days to reply
- 3) Attorney Hanton shall deliver courtesy copy to Judge
Carney via regular mail at 14 W. Jefferson St, Joliet IL
@0432
- 4) This case continued to 7/29/20 at 10:30am

Attorney or Party, if not represented by Attorney

Name Robert Hanta

ARDC# 6286331

Firm Name LORPH

Attorney for Petitioner

Address [REDACTED]

City & Zip [REDACTED]

Telephone [REDACTED]

[REDACTED]
Dated: 6/29, 20 20

Entered: [REDACTED]

Judge

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

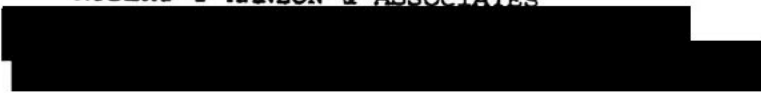
815.774.4560

Andrea Lynn Chasteen
Circuit Court Clerk
OFFICE OF THE CIRCUIT COURT CLERK
Twelfth Judicial Circuit - Will County
57 N. Ottawa Street
Joliet, Illinois 60432
www.circuitclerkofwillcounty.com

Fax 815.774.4580

June 19, 2020

ROBERT T. HANLON
ROBERT T HANLON & ASSOCIATES



CLERK OF CIRCUIT COURT
WILL COUNTY, ILLINOIS

2020 JUN 19 PM 1:10

11:11 AM

RE: 2019 OP 001740
CONNIE L. FORSYTHE
-VS-
JOHN NORTON

To Whom It May Concern:

Enclosed is a copy of the Minute Entry /Court Order entered on
6/19/2020 by the Honorable ARKADIUSZ SMIGIELSKI.

Sincerely,

Andrea Lynn Chasteen
Clerk of the Circuit Court

PTKK

Encl.

cc : Court File

UNKNOWN

+

MISSION STATEMENT

The mission of the Circuit Clerk's office is to serve the citizens of Will County and the participants of the judiciary system in a timely and cost effective manner, providing all court records, information and services with courtesy, efficiency and impartiality.

06/19/20 12:28:52 CH

Stalking No Contact

2019 OP 001740 Judge: SMIGIELSKI ARKADIUSZ From 6/19/2020 To 99/99

Case Names _____	Attorney Names _____	User: PTKK
FORSYTHE CONNIE L	HANLON ROBERT T.	Wsid: CCLK121A
VS		+
NORTON JOHN	UNKNOWN	All Entries :
		+

Date
6/19/2020 No Written Order

6/19/2020

Plaintiff not present. Defendant present pro se. Cause comes on defendant's emergency motion to vacate Order of Protection. Motion is entered and continued for hearing on Defendant's motion. Clerk to notify Plaintiff and Plaintiff's counsel.
Hearing Jun 29,2020 09:00AM Rm100 Judge ORDERS OF PROTECT
Judge:SMIGIELSKI ARKADIUSZ Rep:ELECTRONIC RECORDING Clerk:PTKK

6/19/2020 Letter issued this date Jun 19,2020 Judge SMIGIELSKI SENT TO Plaintiff FORSYTHE CONNIE L
Letter issued this date, June 19, 2020.
Document CJDEL Was Printed

6/19/2020 Letter issued this date Jun 19,2020 Judge SMIGIELSKI SENT TO Atty HANLON ROBERT T.
Letter issued this date, June 19, 2020.
Document CJDEL Was Printed

STATE OF ILLINOIS, CIRCUIT COURT Will _____ COUNTY	NOTICE OF COURT DATE FOR MOTION	For Court Use Only <div style="text-align: center; font-size: 2em; font-weight: bold;">FILED</div> <div style="text-align: center; font-size: 1.5em; font-weight: bold;">2020 JUL 27 AM 9:40</div> <div style="text-align: center; font-size: 0.8em;">CIRCUIT COURT WILL COUNTY, ILLINOIS</div>
Instructions ▼ Directly above, enter the name of the county where the case was filed. Enter the name of the person who started the lawsuit as Plaintiff/Petitioner. Enter the name of the person being sued as Defendant/Respondent. Enter the Case Number given by the Circuit Clerk.	John Norton <hr/> Plaintiff / Petitioner (First, middle, last name) v. Leonard McCubbin Jr. <hr/> Defendant / Respondent (First, middle, last name)	<hr/> 19 L 943 Case Number

In 1a, enter the date and time of your hearing.
The Circuit Clerk will give you the date and time of the hearing when you file your Motion.

In 1b, also enter the address of the court and court room number for the hearing.

1. Hearing Information

The reasons for this hearing are listed in the attached papers called *Motion*.

The hearing for the *Motion* I filed is scheduled for:

- a. Date: July 31, 20 20 Time: 09:00 a.m. p.m.
- b. Address: 14 West Jefferson St Joliet IL 60432

Street
City
State
ZIP

 Courtroom: A236

Under the Code of Civil Procedure, 735 ILCS 5/1-109, making a statement on this form that you know to be false is perjury, a Class 3 Felony.

I certify that everything in the Notice of Court Date for Motion is true and correct. I understand that making a false statement on this form is perjury and has penalties provided by law under 735 ILCS 5/1-109.

If you are completing this form on a computer, sign your name by typing it. If you are completing it by hand, sign and print your name.

/s/ John Norton _____
 Your Signature Street Address

John Norton _____
 Print Your Name Wilmington, IL 60481
City, State, ZIP

Enter your complete current address and telephone number.

PROOF OF DELIVERY

In 1a, enter the name, mailing address, and email address of the party or lawyer to whom you sent the document.

In 1b, check the box to show how you sent the document, and fill in any other information required on the blank lines.

CAUTION: If the other party does not have a lawyer, you may send the document by email only if the other party has listed their email address on a court document.

In c, fill in the date and time that you sent the document.

In 2, if you sent the document to more than 1 party or lawyer, fill in a, b, and c. Otherwise leave 2 blank.

1. I sent this document:

a. To: Name: Robert Hanlon
First Middle Last
 Address: [REDACTED]
Street, Apt # City State ZIP
 Email address: _____

- b. By: Personal hand delivery
 Regular, First-Class Mail, put into the U.S. Mail with postage paid at:
301 N Water St Wilmington, IL 60481
Address of Post Office or Mailbox
 Third-party commercial carrier, with delivery paid for at:

Name (for example, FedEx or UPS) and office address
 The court's electronic filing manager (EFM) or an approved electronic filing service provider (EFSP)
 Email (not through an EFM or EFSP)
 Mail from a prison or jail at:

Name of prison or jail

c. On: July 27, 2020
Date
 At: 5:00 a.m. p.m.
Time

2. I sent this document:

a. To: Name: Meghan Preston
First Middle Last
 Address: [REDACTED]
Street, Apt # City State ZIP
 Email address: _____

- b. By: Personal hand delivery
 Regular, First-Class Mail, put into the U.S. Mail with postage paid at:
301 N Water St Wilmington, IL 60481
Address of Post Office or Mailbox
 Third-party commercial carrier, with delivery paid for at:

Name (for example, FedEx or UPS) and office address
 The court's electronic filing manager (EFM) or an approved electronic filing service provider (EFSP)
 Email (not through an EFM or EFSP)
 Mail from a prison or jail at:

Name of prison or jail

c. On: July 27, 2020

Date

At: 5:00 a.m. p.m.

Time

In 3, if you sent the document to more than 2 parties or lawyers, fill in a, b, and c. Otherwise leave 3 blank.

3. I sent this document:

a. To:

Name: _____
First Middle Last

Address: _____
Street, Apt # City State ZIP

Email address: _____

b. By: Personal hand delivery

Regular, First-Class Mail, put into the U.S. Mail with postage paid at:

Address of Post Office or Mailbox

Third-party commercial carrier, with delivery paid for at:

Name (for example, FedEx or UPS) and office address

The court's electronic filing manager (EFM) or an approved electronic filing service provider (EFSP)

Email (not through an EFM or EFSP)

Mail from a prison or jail at:

Name of prison or jail

c. On: _____

Date

At: _____ a.m. p.m.

Time

I have completed an *Additional Proof of Delivery* form.

If you sent your document to more than 3 parties or lawyers, check the box and file the *Additional Proof of Delivery* form with this form.

Under the Code of Civil Procedure, 735 ILCS 5/1-109, making a statement on this form that you know to be false is perjury, a Class 3 Felony.

If you are completing this form on a computer, sign your name by typing it. If you are completing it by hand, sign and print your name.

I certify that everything in the Proof of Delivery is true and correct. I understand that making a false statement on this form is perjury and has penalties provided by law under 735 ILCS 5/1-109.

/s/ John Norton
Your Signature

Street Address

John Norton
Print Your Name

Wilmington, IL 60481
City, State, ZIP

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

JOHN NORTON,)
)
Plaintiff,)
)
v.)
)
Leonard McCubbin Jr.,)
Connie Hale Forsythe ,)
Micheal Esposito,)
Cynthia L Brzana, Mary Jones,)
Kirk Allen, Becky Becker,)
Arlin Fritz)
)
Defendants.)

19 L 943

FILED
2020 JUL 27 AM 9:40
12TH JUDICIAL CIRCUIT COURT
WILL COUNTY, ILLINOIS

**MOTION
FOR ORDER OF
CONTEMPT OF COURT**

NOW COMES Plaintiff, JOHN NORTON, in support of his Motion, NORTON states as follows:

- 1: that the attorney for Defendants, ROBERT HANLON, filed motions with the court;
- 2: that attorney HANLON has failed to propagate and/or transmit, a copy or facsimile there of, of such documents to the Plaintiff;
- 3: that attorney HANLON has intentionally conducted himself in this matter, in Case 18L718 and again in Case 17OP1740, resulting in delays in both cases, and thus caused further attorney fees and other expenses to be incurred by all parties involved;

4: that attorney HANLON did sign on each Notice Of Motion, under penalty of perjury, that he sent via US Postal Service copies of the motions, yet failed to provide documentation, in any form, as to such actions;

5: that the Plaintiff retains receipts from the US Postal Service of the Time, Date, Amount of Postage and City of Destination of ALL documents propagated to attorney HANLON and is willing and able to present in open court the ORIGINAL documents;

6: that the Plaintiff does NOT have what is commonly known as "Attorney Access" to the Court's online computer network to view such documents.

WHEREAS;

7: The Plaintiff respectfully requests an ORDER OF CONTEMP OF COURT against attorney HANLON;

8: That Plaintiff Norton be granted such other or further relief as this Honorable Court deems just, equitable or necessary;

9: For any other relief this Honorable Court deems just, equitable or necessary.

RESPECTFULLY SUBMITTED,

/SS/ JOHN NORTON

STATE OF ILLINOIS,
CIRCUIT COURT

COUNTY

CERTIFICATION FOR EXEMPTION
FROM E-FILE

For Court Use Only

FILED

2020 JUL 27 AM 9:40

W. K. CIRCUIT COURT
ILL. COUNTY, ILLINOIS

- Instructions**
- Directly above, enter the name of the county where the case was filed.
 - Enter the name of the person who started the lawsuit as Plaintiff/Petitioner.
 - Enter the name of the person being sued as Defendant/Respondent.
 - Enter the Case Number given by the Circuit Clerk or leave this blank if you do not have one.

JOHN NORTON
Plaintiff/Petitioner (First, middle, last name)

v.

LEONARD McCUBBIN JR
Defendant / Respondent (First, middle, last name)

192948
Case Number

In 1, check the reasons you are asking to file by mail or in person. You should check all that apply.

You are exempt from e-filing and you do not need to file this Certification if:

- you are in jail or prison;
- you are filing a will;
- you are filing into a juvenile case;
- OR
- your disability prevents you from e-filing.

1. I am not able to e-file documents in this case for the following reasons (check all that apply):
- I am representing myself and do not have the Internet or a computer in my home. My only access is through a public terminal at a courthouse, library, or other location. This poses a financial or other hardship.
 - I am representing myself and have trouble reading, writing, or speaking in English.
 - I am filing a document in a sensitive case, such as a petition for an order of protection or a civil no contact/stalking order.
 - Due to safety concerns with COVID-19
2. Illinois Supreme Court Rule 8(c)(6) allows for an exemption from e-filing for good cause. For the above reasons, I need a good cause exemption from e-filing for my entire case or until I am able to e-file.

I certify that everything in the Certification for Exemption from E-filing is true and correct. I understand that making a false statement on this form is perjury and has penalties provided by law under 720 ILCS 5/1-109.

Under the Code of Civil Procedure, 735 ILCS 5/1-109, making a statement on this form that you know to be false is perjury, a Class 3 Felony.

After you finish this form, sign and print your name.

Enter your complete address and telephone number.

[Redacted Signature]

Your Signature

Print Your Name

Street Address

City, State, ZIP

Telephone