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Forsythe v Norton 19 OP 1740

Rob Hanlon < Ro Tue 6/30/2020 3:56 PM

To: N9LY8

M. COURCUIT SHEETE 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 Ender." 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 aslo 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.

Noting 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 Petiton 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 indined to agree to any extention as you have had months to respond and you have falled 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.

Rolert T. Hanton

This entail 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 erroll 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,

Proms Rob Hanton Sent: Tuesday, June 23, 2020 4:27 PM

TO: NOLYE Subject: Response to Motion to vacate

Mr. Norton:

Pleaes find attached the Petitioner's response to your Motion to Vacate. You have my prmission 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. Manlon

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 corail system. Unauthorized use, dissembation, distribution or reproduction of this message by other than the intended recipient is strictly prohibited and may be unlawful. Thank you.

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IN THE CIRCUIT CIRCUIT	COURT OF THE TWELFTH JUDICIA	L FILED
CIRCUIT	WILL COUNTY, ILLINOIS	2020 JUL 27 AM 9: 3
Connie Forsythe,	)	WILL COUNTY. ILLINOIS
Petitioner,	)	
v.	) Case: 19 OP	1740
John Norton		
Respondent	j	

## AMENDED MOTION FOR ORDER OF CONTENPT 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 c-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

STATE OF IL		HAENDED NOTICE OF COURT D	PATE  For Court Use Only  FILED  2020 JUL 27 AM 9: 36
Will	COUNTY	FOR MOTION	2020 JUL 27 AM 4: 35
Instructions ▼			WILL COUNTY COURS
Directly above, enter the name of the county where the case was filed.	Connie Forsyth		WILL COUNTY, ILLINOIS
Enter the name of the person who started the lawsuit as Plaintiff/Petitioner.	Plaintiff / Petiti	oner (First, middle, last name)	
Enter the name of the person being sued as Defendant/Respondent.	<b>V</b> .		
Enter the Case Number given by the Circuit Clerk.	John Norton Defendant / Re	spondent (First, middle, last name)	19 OP 1740  Case Number
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#### 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.

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# IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT

#### WILL COUNTY, ILLINOIS

Connie Forsythe,	)	*// HI 2 C
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v.	)	Case: 19 OP 1740
John Norton	) )	
Respondent	)	

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## MOTION FOR ORDER OF CONTENPT 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 Forsythc 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 TY WILL COUNTY,	
Forsighe Connie	
John Worton	CASE NO: 10190P1740
Defendant	
COURT OR	RDER
This cause coming con	to be heard on
Presentment of John Norton	is Emergency Mo-Hen
For order to vacate order. Court Fully advised in tu pr	- of Protectal The
Court Cully advised in the pr.	emises, It is ordered;
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file reply and send for	N9 LYE, @ Hofmail, Com
2) Respendent, Movent, John Nor.	
3) Attorney Hanlow Shull deliver	- Courtery copy to Judge
Carney us a regular Mail of	14 W. Jolesson St. Jollet FC
4) this case continul to 7/29	1/20 at 10:30an
	OI M.
Attorney or Party, if not represented by Attorney  Name Aber Homes  ARDC # 6266331	
Firm Name LORPH	Dated: 6/29 ,20 20
Attorney for Pet: Com	Entered: _
City & Zi	Judge

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

Andrea Lynn Chasteen

815.774.4560

## Circuit Court Clerk OFFICE OF THE CIRCUIT COURT CLERK

Fax 815.774.4580

Twelfth Judicial Circuit - Will County
57 N. Ottawa Street
Joliet, Illinois 60432
www.circuitclerkofwillcounty.com

June 19, 2020

ROBERT T. HANLON & ASSOCIATES

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

COURT DOCKET - WILL COUNTY CIRCUIT CLERK

Stalking No Contact

CSP048 1

Date: 6/19/20:

Time: 10/28/ Page: 1

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

User: PTKK

Case Names

Attorney Names

Wsid: CCLK121A

FORSYTHE CONNIE L

HANLON ROBERT T.

All Entries :

VS NORTON JOHN

UNKNOWN

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

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 IL		NOTICE OF COURT DA	ATE For Court Use Only
Will	COUNTY	FOR MOTION	2020 JUL 27 AM
Instructions ▼  Directly above, enter the name of the county where the case was filed.	John Norton		W.L. COUNTY, ILLINOIS
Enter the name of the person who started the lawsuit as Plaintiff/Petitioner.	Plaintiff / Petiti	oner (First, middle, last name)	
Enter the name of the person being sued as Defendant/Respondent.	v.	112- I-	10   043
Enter the Case Number given by the Circuit Clerk.	Leonard McCu Defendant / Re	espondent (First, middle, last name)	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.		ns for this hearing are listed in the ang for the <i>Motion</i> I filed is scheduled	d for.
In 1b, also enter the address of the court and court room number for the hearing.		ss: 14 West Jefferson St Joliet IL 6 Street  oom: A236	City State ZIP
Under the Code of Civil Procedure, 735 ILCS 5/1-109, making a statement on this form that you know to	understand t		Date for Motion is true and correct. I this form is perjury and has penalties provide
be false is perjury, a Class 3 Felony.  If you are completing	/s/ John Nort		Street Address
this form on a computer, sign your name by typing it. If you are completing it by hand, sign and print your name.	John Norton Print Your Nar		Wilmington, Il 60481  City, State, ZIP
Enter your complete current address and telephone number.			

#### PROOF OF DELIVERY

1. I sent this document:

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.

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2. I sent this document:

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5:00

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

JOHN NORTON,	)		
	)		
Plaintiff,	)		
	)	19 L 943	
v.	)		
	)		~2
Leonard McCubbin Jr.,	)		2020
Connie Hale Forsythe,	)		C: 4
Micheal Esposito,	)		0 2 P
Cynthia L Brzana, Mary Jones,	)		130 J
Kirk Allen, Becky Becker,	)		三 宝。
Arlin Fritz	)		H 9: 40
	)		등조 <b>5</b>
Defendants.	)		•

## 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

	sent them	is approved by the	Winota Supreme	£	
	STATE OF CIRCUIT	COURT	CERTIFICATION	d is required to be acco	Pried in all Illinois Gircuit Courts.
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