

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

Cynthia Brzana)

Plaintiff,)

v.)

John Norton)

Defendant.)

Case No.

2018 L 000 718

2021 FEB 26 PM 1:38
CLERK, CIRCUIT COURT
WILL COUNTY, ILLINOIS

FILED

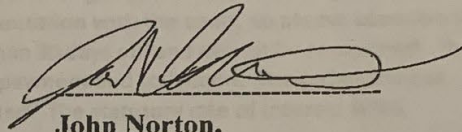
MOTION FOR DISCOVERY

NOW COMES the defendant, JOHN NORTON, with this Motion and states to this Honorable Court as follows:

1. That on 18 February, 2021, Robert T. Hanlon, attorney for the Plaintiff, sent the following e-mail, of which a copy is attached to this Motion (Exhibit A);
2. That in the e-mail, attorney Hanlon stated that he was in possession of Defendant Norton's banking details, specifically his credit card details WITHOUT a Court Order;
3. That upon knowledge and belief, attorney Hanlon did share with others, specifically Kirk Allen and John Kraft, commonly known as The Edgar County Watchdogs, a political action group, the information that he obtained;
4. That such information is protected under the United States Privacy Act of 1976, as amended;
5. That Defendant Norton no longer utilizes banking institutions within the jurisdiction of the United States, its territories or its possessions, to preclude any further such intrusions;
6. That on 18 February, 2021, a report and complaint of this incursion was made to Will County Sheriffs Department and other such Federal Investigative Agencies to determine if any bank fraud regulations have been violated;

WHEREFORE, the defendant, JOHN NORTON, respectfully requests this Honorable Court grant the following Motion and such Order as follows:

- 1: That the Plaintiffs attorney be ordered to disclose the manner in which he obtained such information;**
- 2: That attorney Hanlon be ordered to disclose to this Court, and all affected parties, to whom he propagated such information:**
- 3: For any other relief this Honorable Court deems equitable and just.**



**John Norton,
Defendant**

Upcoming Citation to Discover Assets

Rob Hanlon <Robert@ROBHANLONLAW.COM>

Thu 2/18/2021 6:00 PM

To: 'N9LYE@hotmail.com' <N9LYE@hotmail.com>

Mr. Norton

Please be advised that during your citation to discover assets, I am aware that you have a Credit or debit card ending with 9367. You are required to bring that card and all of your other debit or credit cards with you to the Citation Examination. The court typically will swear you in and then you and I will be required to talk. Because it is a zoom call in accord with the rules of the Circuit Court, no personal appearance is required. I am asking you to deliver to me copies via e-mail. We will likely be occupied for about two hours. I am also directing you to provide to me your tax documents electronically in light of the COVID 19 orders of the Circuit Court.

If you have any questions, please e-mail them to me and I will get this wrapped up as quickly as possible. I have every intention of sharing this communication with the court, so please abandon the rhetoric and understand that the judgment is more than 30 days old and cannot be re-opened. It's not about whether or not you owe the judgment, it's about payment and collection. The judgment has statutory interest on it and grows until it is fully collected. The statutory rate of interest is 9%.

Robert T. Hanlon
131 East Calhoun
Woodstock, Illinois 60098
815-206-2200

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02/26/21 15:22:39 WCCB