

STATE OF ILLINOIS, CIRCUIT COURT  COUNTY	APPEARANCE Pro Se	<i>For Court Use Only</i>  <b>FILED</b>  21 MAY 17 PM 12:55  CLERK, CIRCUIT COURT WILL COUNTY, ILLINOIS,
<b>Instructions ▼</b> Directly above, enter the name of the county where the case was filed  Enter the name of the person or company that filed this case as Plaintiff/Petitioner  Enter the name of the Defendant/Respondent  Enter the Case Number given by the Circuit Clerk	<u>ROBERT HANLON</u> Plaintiff / Petitioner (First, middle, last name or Company)  v  <u>JOHN NORTON</u> Defendant / Respondent (First, middle, last name)	     <u>2021 OP 680</u> Case Number

In 1, enter your full name

In 2, check only one box to ask for a trial with only a judge or a trial with a judge and jury

You do not have a right to a jury trial in every case


1. I, JOHN E NORTON enter my appearance in this case.  
                     First                    Middle                    Last
2. I would like a trial with:
- ☒ a judge
- ☐ a judge and jury

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 address and telephone number

I certify that everything above 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.

 1834 ROBERT  
 Your Signature Street Address

JOHN NORTON WILMINGTON IL 60481  
 Your Name City, State, ZIP

\_\_\_\_\_  
 Telephone

**GETTING COURT DOCUMENTS BY EMAIL:** If you agree to receive court documents by email, check the box below and enter your email address. You should use an email account that you do not share with anyone else and that you check every day. If you do not check your email every day, you may miss important information or notice of court dates. Other parties may still send you court documents by mail.

☐ I agree to receive court documents at this email address during my entire case

\_\_\_\_\_  
 Email

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

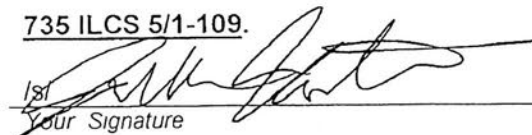
\_\_\_\_\_  
*Name of prison or jail*

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 *Additional Proof of Delivery* with this form.

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

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.**

181  
  
 Your Signature

1834 ROBERT  
 Street Address

JOHN NORTON  
 Print Your Name

WILMINGTON IL  
 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.

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.

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

FILED

Robert Hanlon

Plaintiff,

v.

John Norton

Defendant

21 MAY 17 PM 12:55

CLERK, CIRCUIT COURT  
WILL COUNTY, ILLINOIS

Case: 2021 OP 680

**MOTION TO RECONSIDER**

NOW COMES Defendant, JOHN NORTON, to bring this MOTION TO RECONSIDER, and, in support of his MOTION, NORTON states as follows:

1: that on May 7, 2021, Defendant Norton was prevented from arriving to Court on time due to two (2) flat tires, cause by unknown person or persons, on the vehicle he operates;

2: that the Defendant believes this was done intentionally to preclude him from Court proceedings;

3: that upon knowledge and belief that Attorney Hanlon made this Petition to discredit both the Defendant and his daughter, Sarah, as witnesses in Case No. 19 CH 1143 (Exhibits 1 and 2);

4: that there is an ACTIVE and ONGOING investigation by the Attorney Generals Office in Springfield by Scott Kincade, 217-546-3523, into Attorney Hanlon for Witness Intimidation and Improper Conduct by an Attorney after receiving multiple ARDC Complaints and Affidavits filed in Case No. 19 CH 1143 and Algonquin Township (unknown case number);

**WHEREAS:**

**5: That Defendant Norton respectfully requests that this MOTION TO RECONSIDER be granted and a date set to hear oral arguments.**

**Respectfully Submitted,**

**/ss/ John Norton**

---

**John Norton**



# EXHIBIT 1

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

CYNTHIA BRZANA and TIM GRANT, )

Plaintiffs, )

v. )

WESLEY TOWNSHIP and WESLEY  
TOWNSHIP ROAD DISTRICT, )

Defendants. )

Case No. 2019 CH 1143

### Affidavit of Sarah Norton

I, Sarah Norton, after being duly sworn, state under oath as follows:

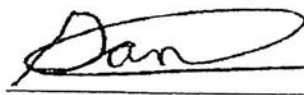
1. I am over 18 years of age, and the statements made in this Affidavit are based on my personal knowledge. If called to testify, I could competently testify to the facts stated herein.
2. On or around May 3<sup>rd</sup>, 2020, I signed an affidavit stating, among other things, that I willfully and intentionally refused to answer FOIA requests from Cynthia Brzana and Tim Grant while I was the Wesley Township Clerk.
3. I was pressured into signing this affidavit by Brzana and Grant's attorney, Robert Hanlon.
4. Mr. Hanlon came to my workplace unannounced around midnight. I work there alone, so only him and I were there. I felt intimidated because Mr. Hanlon is a large man and is a lawyer.
5. Mr. Hanlon is currently representing Ms. Brzana in a lawsuit in which my grandfather, father, and I are the defendants. That lawsuit is captioned *Cynthia Brzana and Michael Esposito v. Kathleen Kennedy, Donald Norton, John Norton, and Sarah Norton*, 2018-L-718. Mr. Hanlon told me that if I signed the affidavit he would dismiss me as a defendant from this lawsuit.

6. I felt intimidated and scared. Mr. Hanlon started to say mean things about my father, and I just wanted him to leave. I signed the affidavit that he gave me so that he would go away. I did not really read through the affidavit before I signed it.
7. Not everything in the affidavit I signed is true. Everything in the affidavit was written by Mr. Hanlon, not by me. Mr. Hanlon did not consult with me before he drafted the affidavit.
8. One thing in the affidavit that is not true are the sentences where I say that I willfully and intentionally refused to answer FOIA requests submitted by Ms. Brzana and Mr. Grant.
9. I did my best to answer their FOIA requests on time. However, the Township received lots of FOIA requests, sometimes fifty in one weekend. It was mostly just me answering the FOIA requests, and I simply could not keep up with all of them.
10. I tried my best but just did not have the time or ability to answer every FOIA request submitted by Ms. Brzana and Mr. Grant.
11. I am very sorry for any confusion I have caused. I have always tried to work hard and do my best. I would not have signed the affidavit given to me by Mr. Hanlon if I was not scared and intimidated at the time.

FURTHER AFFIANT SAYETH NAUGHT.

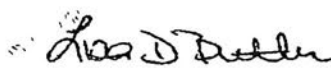
Under penalties as provided by law pursuant to section 1-109 of the Code of Civil Procedure (735 ILCS 5/1-109), the undersigned certifies that the statements set forth in this affidavit are true and correct.

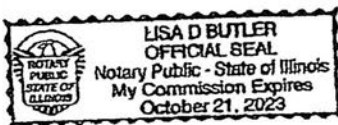
Executed on September 9, 2020



Sarah Norton

SUBSCRIBED and SWORN to  
before me this 9 day of September, 2020.

  
Notary Public  
9/9/2020



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

CYNTHIA BRZANA and TIM GRANT, )

Plaintiffs, )

v. )

Case No. 2019 CH 1143

WESLEY TOWNSHIP and WESLEY )

TOWNSHIP ROAD DISTRICT, )

Defendants. )

**Affidavit of John Norton**

I, John Norton, after being duly sworn, state under oath as follows:

1. I am over 18 years of age, and the statements made in this Affidavit are based on my personal knowledge. If called to testify, I could competently testify to the facts stated herein.
2. I am familiar with the document attached as Exhibit 1. This is an affidavit signed by my daughter, Sarah Norton.
3. I witnessed my daughter reviewing the allegations in the affidavit. I reviewed them with her, and she told me that everything in the affidavit was accurate.
4. She then asked me to drive her to the Wilmington Public Library to have the affidavit notarized. I drove her there because she does not drive.
5. I went into the library with her and saw her walk to the notary. I then saw her sign the affidavit attached as Exhibit 1 in the presence of the notary and then saw the notary notarize the affidavit.
6. I am sure that the signature on Exhibit 1 is that of my daughter, Sarah Norton.

FURTHER AFFIANT SAYETH NAUGHT.

Under penalties as provided by law pursuant to section 1-109 of the Code of Civil Procedure (735 ILCS 5/1-109), the undersigned certifies that the statements set forth in this affidavit are true and correct.



<b>STATE OF ILLINOIS, CIRCUIT COURT</b>		<b>NOTICE OF COURT DATE FOR MOTION</b>		<i>For Court Use Only</i>	
Will _____ COUNTY				<b>FILED</b>  <b>21 MAY 17 PM 12:55</b>  CLERK, CIRCUIT COURT WILL COUNTY, ILLINOIS	
<b>Instructions ▼</b>					
Directly above, enter the name of the county where the case was filed.		Robert Hanlon			
Enter the name of the person who started the lawsuit as Plaintiff/Petitioner.		Plaintiff / Petitioner (First, middle, last name)			
Enter the name of the person being sued as Defendant/Respondent		v.			
Enter the Case Number given by the Circuit Clerk.		John Norton		2021 OP 680	
		Defendant / Respondent (First, middle, last name)		Case Number	

Enter your complete  
current address and  
telephone number.

## 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.

Redacted to protect Victim's address

a To:

Name:

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:

Wilmington, IL

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:

18 May 2021

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

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Mail from a prison or jail at:

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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:

\_\_\_\_\_  
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\_\_\_\_\_  
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c. On: \_\_\_\_\_  
Date  
At: \_\_\_\_\_ ☐ a.m. ☐ p.m.  
Time

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

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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

1834 Robert St  
Street Address

John Norton  
Print Your Name

Wilmington, IL 60481  
City, State, ZIP

\_\_\_\_\_  
Telephone

STATE OF ILLINOIS, CIRCUIT COURT  COUNTY	CERTIFICATION FOR EXEMPTION FROM E-FILEING	<i>For Court Use Only</i>  <div style="font-size: 2em; font-weight: bold; text-align: center;">FILED</div> <div style="text-align: center;">21 MAY 17 PM 12:55</div> <div style="text-align: center;">CLERK, CIRCUIT COURT WILL COUNTY, ILLINOIS</div>
<div style="border: 1px solid black; padding: 2px;">Instructions ▼</div> <div style="border: 1px solid black; padding: 2px;">Directly above, enter the name of the county where the case was filed.</div> <div style="border: 1px solid black; padding: 2px;">Enter the name of the person who started the lawsuit as Plaintiff/Petitioner</div> <div style="border: 1px solid black; padding: 2px;">Enter the name of the person being sued as Defendant/Respondent</div> <div style="border: 1px solid black; padding: 2px;">Enter the Case Number given by the Circuit Clerk or leave this blank if you do not have one.</div>	<div style="text-align: center; font-size: 1.5em; font-family: cursive;">ROBERT HANLON</div> <div style="text-align: center; font-size: 0.8em;">Plaintiff / Petitioner (First, middle, last name)</div> <div style="text-align: center; margin: 10px 0;">v</div> <div style="text-align: center; font-size: 1.5em; font-family: cursive;">JOHN NORTON</div> <div style="text-align: center; font-size: 0.8em;">Defendant / Respondent (First, middle, last name)</div>	<div style="border: 1px solid black; padding: 5px; margin-top: 20px;"> <div style="font-size: 1.5em; font-family: cursive;">2021 OP 680</div> <div style="font-size: 0.8em;">Case Number</div> </div>

In 1, check the reasons you are asking to file by mail, in person, or by other means. 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.
- ☐ I tried to e-file my documents, but I was unable to complete the process because the equipment or assistance I need is not available.

2. Illinois Supreme Court Rule 9(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.

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, telephone number, and email address, if you have one.

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.

<div style="text-align: center;"> <div style="border-top: 1px solid black; width: 100%;"></div> <div style="font-size: 0.8em;">Your Signature</div> </div> <div style="text-align: center; margin-top: 10px;"> <div style="border-top: 1px solid black; width: 100%;"></div> <div style="font-size: 0.8em;">Print Your Name</div> </div> <div style="text-align: center; margin-top: 10px;"> <div style="border-top: 1px solid black; width: 100%;"></div> <div style="font-size: 0.8em;">Telephone</div> </div>	<div style="text-align: center;"> <div style="border-top: 1px solid black; width: 100%;"></div> <div style="font-size: 0.8em;">Street Address</div> </div> <div style="text-align: center; margin-top: 10px;"> <div style="border-top: 1px solid black; width: 100%;"></div> <div style="font-size: 0.8em;">City, State, ZIP</div> </div> <div style="text-align: center; margin-top: 10px;"> <div style="border-top: 1px solid black; width: 100%;"></div> <div style="font-size: 0.8em;">Email</div> </div>
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