

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

Andrea Lynn Chasteen  
Will County Circuit Clerk  
Twelfth Judicial Circuit Court  
Electronically Filed  
2019L 000943  
Filed Date: 9/30/2021 8:54 AM  
Envelope: 15021693  
Clerk: VG

John Norton

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Plaintiff,

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v.

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Leonard McCubbin JR et.al.

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Case No. 2019 L 943

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Defendant.

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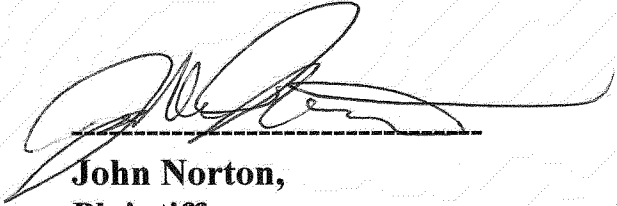
**MOTION FOR DISCOVERY  
AND ORDER**

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

- 1: that due to a very high probability of Spoliation Of Evidence, evidence may be lost, destroyed or altered;**
- 2: that on September 16, 2021, at 1:30 PM, the Court was notified of the presence of John Kraft, co-founder of Edgar County Watchdogs LLC;**
- 3: that Defendant Kirk Allen is the other co-founder of Edgar County Watchdogs LLC;**
- 4: that John Kraft was operating a Cell phone/Smart phone in the courtroom;**
- 5: that Defendant Brzana, also present in the courtroom, was using an Apple I-Watch, linked to John Kraft's cell phone, to record the proceedings;**
- 6: during the hearing, Plaintiff Norton noticed Defendant Brzana making numerous motions with her arm in which to point the I-Watch built-in camera towards the Plaintiff by pretending to adjust her wig;**
- 7: that Plaintiff Norton did note the presence of video security cameras in the courtroom that can confirm her actions;**

**WHEREFORE, the Plaintiff, JOHN NORTON, respectfully requests this Honorable Court grant the following MOTION and such Order as follows:**

- 1: That John Kraft be DENIED further use of a cell phone and/or smart phone while in this court;**
- 2: that John Kraft be ordered to turn over any recordings and photos taken while in this court;**
- 3: that copies of the Video Security System footage in Courtroom 1002 on 16 September 2021 between the hours of 1 PM and 4 PM be given to the Plaintiff.**



**John Norton,  
Plaintiff**