

EXHIBIT

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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BONNIE KUROWSKI,)	
)	
Plaintiff,)	No. 21-cv-4363
)	
v.)	The Honorable Judge Gary M. Feinerman
JOHN KRAFT ET AL,)	
)	
Defendants.)	

**PLAINTIFF'S ANSWERS TO
DEFENDANTS' FIRST SET OF INTERROGATORIES**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Plaintiff, Bonnie Kurowski, by and through her attorneys Gardiner Koch Weisberg & Wrona, hereby responds to Defendants' First Set of Interrogatories, served by Defendants, John Kraft, Kirk Allen, Alyssia Benford, Cynthia Brzana, Sherri Grimmenga, Krista Wing, Becky Becker and Edgar County Watchdogs, and states as follows:

GENERAL OBJECTIONS

Plaintiff generally objects to the Interrogatories on the following grounds, each of which is expressly incorporated by reference in the responses to the individual interrogatories below. All responses set forth herein are subject to and without waiver of any of these General Objections.

1. Plaintiff objects to the instructions and definitions set forth in the Interrogatories to the extent that they: (a) seek to impose on Plaintiff's obligations that are not imposed by law, or are otherwise inconsistent with the Federal and/or Illinois Rules of Civil Procedure Code of Civil Procedure or applicable case law; (b) are vague or ambiguous; (c) seek unreasonably duplicative responses; (d) are overbroad in terms of scope or duration; and/or (e) are unduly burdensome or oppressive in that they would require a search for information that is of little or no benefit with

respect to the issues or controversies in this action, so that the value of information would be far outweighed by the burden of obtaining them.

2. Plaintiff objects to the Interrogatories to the extent that they seek or require the disclosure of information or documents that are protected from discovery by the attorney-client privilege, the attorney work-product doctrine, the joint prosecution or common interest privilege, the right to privacy, or any other applicable privilege or immunity. Such responses as may hereafter be provided pursuant to the Interrogatories shall not include any information protected by such privileges or doctrines. Inadvertent disclosure of any such information is not intended to be and shall not operate as, a waiver of any applicable privilege, protection or immunity, in whole or in part.

3. Plaintiff's objections are provided without prejudice to Plaintiff's right to produce evidence of any subsequently discovered facts or any facts that Plaintiff may later recall, and with express rights to revise, correct, supplement or clarify any objections or responses set forth herein at a later time.

4. If Plaintiff later discovers documents or information responsive to any interrogatory but determines that based on Plaintiff's objections that Plaintiff will not produce the responsive documents, Plaintiff will notify Defendant by amending these Responses.

5. By responding to the Interrogatories, Plaintiff does not concede the relevancy, materiality or admissibility as evidence of any of the information sought.

6. Plaintiff objects to the Interrogatories and each and every instruction, definition and individual interrogatory therein to the extent that they call for information outside of Plaintiff's possession, custody or control, or to the extent that they seek information that is already within

Plaintiff's possession, custody or control, or to the extent that they purport to require Plaintiff to create new documents or discover new information himself.

7. Plaintiff objects to the Interrogatories and each and every instruction, definition and interrogatory therein to the extent that they call for information readily available through public sources, or from sources that are more convenient, less burdensome or less expensive.

8. No objection, limitation, response, or lack thereof made in this Response is intended as an admission by Plaintiff as to the existence or non-existence of information responsive to the Interrogatories.

9. This Response to the Interrogatories is made without waiving and expressly reserving Plaintiff's right to: (a) object on any ground to the use of the information provided in the Responses in any stage or proceeding in this action or any other action; (b) object on any ground to other information that involves or relates to the subject matter of the Interrogatories; or (c) revise, correct, supplement or clarify any of the Responses set forth herein at a later time.

10. The inadvertent production or revelation of privileged or otherwise protected information shall not be deemed to waive the privilege or protection with respect to such information or any other information.

11. The information provided herein is based on Plaintiff's present knowledge, information, and belief. Plaintiff reserves the right to supplement, amend or correct all or any parts of any response provided herein, which are subject to such additional or different information as discovery or further investigation may disclose.

12. By making a specific objection to a particular interrogatory, Plaintiff does not imply that the specific objection is not applicable in response to any other particular interrogatory, or that the General Objections are not applicable to that interrogatory.

ANSWERS TO INTERROGATORIES

INTERROGATORY NO. 1: Identify any and all documents that you intend to use to support any claim within your complaint or supports any cause of action you believe you have against any named Defendant.

ANSWER: Plaintiff objects to this Interrogatory on the basis that it is overbroad and vague. Plaintiff further objects to the extent that this Interrogatory seeks information protected by the attorney-client or the attorney work product privileges. Subject to and without waiving the aforementioned objections and Plaintiff's general objections, Plaintiff directs Defendants to her Request for Production Responses Bates Nos. 1-780. Plaintiff reserves the right to supplement her responses.

INTERROGATORY NO.2: Identify by the name of Each Defendant the Conduct that you ascribe to each of them referenced in the Complaint as being conducted by Defendants.

ANSWER: Plaintiff objects to this Interrogatory as it is overbroad, vague, and confusing. Plaintiff further objects to this Interrogatory as it requires a narrative response and is thus better suited for a deposition. Subject to and without waiving the aforementioned objections and Plaintiff's general objections, Plaintiff directs Defendants to the Amended Complaint and answers with the following. Plaintiff reserves the right to supplement her responses.

- **ECW, Kraft, and Allen: Exhibits 1, 2, and 5-18 of the Complaint**
 - **Kurowski 116, 118, 124-132, 154-171, 175-179, 184-191, 196, 198, 281-283, 334, 623-686, 789-792;**
- **Allen: Kurowski 201-203, 206, 216, 226, 247-249, 253, 266, 286, 310-311, 326, 351-356-357, 410, 417, 524-525, 529, 699;**

- Kraft: Kurowski 116, 195, 197, 220-221, 283-286, 293-296, 309, 312-315, 335, 340, 356-357, 410, 412-413, 414, 419, 427, 429-430, 529, 537-542, 688-744;
- Wing: Kurowski 108, 114-116, 134, 174, 183, 199-201, 204-205, 210-216, 218-219, 223-247, 250, 252-258, 260-261, 267-269, 286-292, 298-307, 315-320, 327-330, 336-339, 341-346, 365-366, 369-370, 373-386, 390-394, 403, 409, 420, 571-616, 745-780;
- Brzana: Kurowski 106, 109, 117, 120-122, 133, 135-147, 190-194, 207-209, 220-247, 249, 251, 253, 259, 262-266, 270-276, 279-280, 288, 304, 307-308, 321-329, 343-346, 349, 362-368, 400-407, 410, 413, 417-418, 420-423, 425-428, 516-523, 525-526, 529, 532-537, 543-544, 792-800;
- Kraft, Allen, & Brzana: Kurowski 105, 107, 112-113, 182-183, 185, 220-222, 276-280, 296-297, 310, 322, 331-334, 347-349, 367, 408, 421, 424, 530, 545-547;
- Benford: Kurowski 296, 319, 329-330, 365-366, 372, 411, 423, 425, 429, 525.

INTERROGATORY NO.3: All documents that You referred to, referenced in your Counter-claim either expressly or by way of implication.

ANSWER: Subject to and without waiving Plaintiff's general objections, Plaintiff does not have a counterclaim. Plaintiff reserves the right to supplement her responses.

INTERROGATORY NO.4: Any document you intend to use in supplement of a dispositive motion or that you intend to use at trial of this matter.

ANSWER: Plaintiff objects to this Interrogatory as premature, but Plaintiff reserves the right to supplement her responses.

INTERROGATORY NO. 5: As to each statement complained of by you, state with specificity the author of the statement and the date upon which it was made.

ANSWER: Subject to and without waiving Plaintiff's general objections, Plaintiff directs Defendants to her Amended Complaint and answers with the following. Plaintiff reserves the right to supplement her responses.

- **ECW, Kraft, and Allen: Exhibits 1, 2, and 5-18 of the Complaint**
 - **Kurowski 116, 118, 124-132, 154-171, 175-179, 184-191, 196, 198, 281-283, 334, 623-686, 789-792;**
- **Allen: Kurowski 201-203, 206, 216, 226, 247-249, 253, 266, 286, 310-311, 326, 351-356-357, 410, 417, 524-525, 529, 699;**
- **Kraft: Kurowski 116, 195, 197, 220-221, 283-286, 293-296, 309, 312-315, 335, 340, 356-357, 410, 412-413, 414, 419, 427, 429-430, 529, 537-542, 688-744;**
- **Wing: Kurowski 108, 114-116, 134, 174, 183, 199-201, 204-205, 210-216, 218-219, 223-247, 250, 252-258, 260-261, 267-269, 286-292, 298-307, 315-320, 327-330, 336-339, 341-346, 365-366, 369-370, 373-386, 390-394, 403, 409, 420, 571-616, 745-780;**
- **Brzana: Kurowski 106, 109, 117, 120-122, 133, 135-147, 190-194, 207-209, 220-247, 249, 251, 253, 259, 262-266, 270-276, 279-280, 288, 304, 307-308, 321-329, 343-346, 349, 362-368, 400-407, 410, 413, 417-418, 420-423, 425-428, 516-523, 525-526, 529, 532-537, 543-544, 792-800;**
- **Kraft, Allen, & Brzana: Kurowski 105, 107, 112-113, 182-183, 185, 220-222, 276-280, 296-297, 310, 322, 331-334, 347-349, 367, 408, 421, 424, 530, 545-547;**
- **Benford: Kurowski 296, 319, 329-330, 365-366, 372, 411, 423, 425, 429, 525.**

INTERROGATORY NO.6: Identify all documents evidencing any communication between you and any person you have identified in your 26(a) disclosures.

ANSWER: Plaintiff objects to this Interrogatory on the grounds that it is overly burdensome and covers documents that could potentially be covered by the Illinois Reporter's Privilege codified in 735 ILCS 5/8-901. Investigation continues for those documents that are not covered by applicable privilege. Plaintiff reserves the right to supplement her responses.

INTERROGATORY NO.7: State the specific reason provided by any agent of Jarden & Howard Technologies, Inc. ("JHT") related to your separation of employment from "JHT".

ANSWER: To the best of Plaintiff's recollection, no official reason was given with the exception of the company warning. Subject to and without waiving Plaintiff's general objections, Plaintiff directs Defendants to Kurowski 152-153, 432. Plaintiff states that, to the best of her understanding, JHT was worried about image. Plaintiff reserves the right to supplement her responses.

INTERROGATORY NO. 8: Identify each false statement you have made in connection with any litigation in which you were a party, in any court.

ANSWER: Plaintiff objects to this Interrogatory as it is overbroad and is not likely to lead to the discovery of admissible evidence. Subject to and without waiving Plaintiff's general objections, to the best of Plaintiff's recollection, she does not recall making any false statements. In her trademark application, due to a scrivener's error, she was listed as having a PhD, even though she does not. She further clarifies her statement in the Petition

for Injunction for Protection Against Stalking filed against Theresa Bhoj When Plaintiff referred to “my company” in the Petition, she was not referring to JHT, but her own company, specifically PCC, LLC, as to the Department of Defense employee statement, she mistakenly stated that she was a Department of Defense employee, but she has two Department of Defense certified companies. Plaintiff reserves the right to supplement her responses.

INTERROGATORY NO.9: With respect to the allegations in your complaint in paragraphs 14, state how you suffered any injury related to the claim set forth therein.

ANSWER: Plaintiff objects to this Interrogatory as it is overbroad and vague. Subject to and without waiving Plaintiff's general objections and this objection, Plaintiff states that she has had substantial business loss because her credibility has been attacked. Further, Plaintiff states that she has lost employment from JHT. Plaintiff reserves the right to supplement her responses. See also Kurowski 153-153.

INTERROGATORY NO. 10: With regard to the allegation of paragraph 15 of the Complaint, state with specificity the amount of student loan debt you owed at the time you filed any bankruptcy petition.

ANSWER: Plaintiff states that she does not have documents that would enable her to state a specific amount of loan debt owed at the time of each of her bankruptcies. Subject to and without waiving Plaintiff's general objections, Plaintiff estimates that for her 2008 bankruptcy she owed approximately \$191,830. She estimates that for her 2018 bankruptcy she owed approximately \$274,876. Plaintiff reserves the right to supplement her responses.

INTERROGATORY NO. 11: Identify any lawsuit or legal proceeding in which you were a Party, witness, or agent of a party.

ANSWER: Plaintiff objects to this Interrogatory as it is overbroad and unlikely to lead to the discovery of admissible evidence. Subject to and without waiving Plaintiff's general objections, and the aforementioned objection, Plaintiff states as follows:

1. This current case;
2. *Kurkowski-Alicea v. Village of Bolingbrook* Will County;
3. *Verde Ridge Homeowners Association, Inc., v. Bonnie Alicea*, Opposition No. 91225523 Trademark proceeding, USPTO Trademark Trials and Appeal Board;
4. *Edgar County Watchdogs inc., et al v Kurowski, Bonnie* Case No. 5:2021cv00302 Civil suit, Ocala Division Florida Court;
5. *Bonnie K Kurowski-Alicea and Thomas Alicea* Case No. 6:2018bk05944 Bankruptcy, Middle District of Florida;
6. *Kurowski-Alicea v Ed Financial* Case No. 6:2018ap00110, Plaintiff dropped this case, Middle District of Florida Bankruptcy court;
7. *Kurowski-Alicea, Bonnie* Case No. 1:2008bk04484 Bankruptcy, Northern District of Illinois Bankruptcy court;
8. *Ardmin Properties*, Case No. 2007L000223, in which Plaintiff was a counter plaintiff and named as a third-party, Will County Circuit Court, State of Illinois;
9. *Bonnie Kurowski vs Len Wowzakk* Case No. 1994SC008264 Small Claims, Will County Circuit Court, State of Illinois.

Plaintiff reserves the right to supplement her response.

INTERROGATORY NO. 12: Provide a calculation of your damages that you claim and the basis for the damages you claim in this case.

ANSWER: Investigation continues. Subject to and without waiving Plaintiff's general objections, Plaintiff respond with documents Kurowski 5-97. Plaintiff reserves the right to supplement her responses.

INTERROGATORY NO. 13: All records associated with any telephone used by you or available to you in the relevant period of time of January 1, 2021 to the present.

ANSWER: Plaintiff objects to this Interrogatory as it is overbroad, and it is unduly burdensome when compared with the claims of this case and is unlikely to lead to the discovery of admissible evidence. Plaintiff reserves the right to supplement her responses.

INTERROGATORY NO. 14: Identify with specificity any statement made by Defendants Alyssia Benford, Cynthia Brzana, Sheri Grimmenga, Krista Wing, Becky Becker that you contend are defamatory.

ANSWER: Subject to and without waiving Plaintiff's general objections, Plaintiff directs Defendants to the following. Plaintiff reserves the right to supplement her responses.

- **Wing:** Kurowski 108, 114-116, 134, 174, 183, 199-201, 204-205, 210-216, 218-219, 223-247, 250, 252-258, 260-261, 267-269, 286-292, 298-307, 315-320, 327-330, 336-339, 341-346, 365-366, 369-370, 373-386, 390-394, 403, 409, 420, 571-616, 745-780;
- **Brzana:** Kurowski 106, 109, 117, 120-122, 133, 135-147, 190-194, 207-209, 220-247, 249, 251, 253, 259, 262-266, 270-276, 279-280, 288, 304, 307-308, 321-329, 343-346, 349, 362-368, 400-407, 410, 413, 417-418, 420-423, 425-428, 516-523, 525-526, 529, 532-537, 543-544, 792-800;

- **Benford: Kurowski 296, 319, 329-330, 365-366, 372, 411, 423, 425, 429, 525.**

INTERROGATORY NO. 15: Identify each purported news article you have published that does not involve any of the Defendants in this case.

ANSWER: Plaintiff objects to this Interrogatory on the basis that it is overbroad and unduly burdensome. Defendants can visit the websites referenced below, in Plaintiff's answer to Interrogatory No. 16. Plaintiff reserves the right to supplement her responses.

INTERROGATORY NO. 16: Identify the date and web address you began publishing the web sites referenced in your complaint.

ANSWER: Subject to and without waiving Plaintiff's general objections, to the best of her recollection, Plaintiff states as follows: Bolingbrook Reporter was launched in September of 2020 and the web page is <https://bolingbrookreporter.org/>; The Illinois Reporter launched February of 2021 and its web page is <https://illinoisreporter.org/>; The Macomb Reporter launched April of 2021 and the web page is <https://www.facebook.com/pages/category/News---media-website/Macomb-Reporter-103955975153173/>; The Will County Reporter launched April of 2021 and its web page is <https://willcountyreporter.com/>; Citizens for a Better Bolingbrook originated as a Facebook page in 2008, and Plaintiff began posting on it in August of 2020 the website is already known by Defendants; and Plaintiff began posting on Bolingbrook Watchdog sometime in 2018, the website is already known by Defendants. Plaintiff reserves the right to supplement her responses.

INTERROGATORY NO. 17: Identify each and every reason you have for creating the website "edgarcountywatchdog.com".

ANSWER: Plaintiff objects to this Interrogatory on the grounds that the "edgarcountywatchdog.com" is not relevant to this lawsuit. Plaintiff reserves the right to supplement her responses.

INTERROGATORY NO. 18: Identify the face book page referenced in paragraph 20 of your complaint.

ANSWER: Subject to and without waiving Plaintiff's general objections, Plaintiff directs Defendants to her Amended Complaint, in particular paragraphs Nos. 19, 20. Plaintiff reserves the right to supplement her responses.

INTERROGATORY NO. 19: Explain how you were purportedly harassed and interfered with as alleged in paragraph 20 of the Complaint.

ANSWER: Plaintiff objects to this Interrogatory on the basis that it seeks a narrative answer and is thus better suited for a deposition. Subject to and without waiving Plaintiff's general objections, see the following. Plaintiff reserves the right to supplement her responses.

- ECW, Kraft, and Allen: Exhibits 1, 2, and 5-18 of the Complaint
 - Kurowski 116, 118, 124-132, 154-171, 175-179, 184-191, 196, 198, 281-283, 334, 623-686, 789-792;
- Allen: Kurowski 201-203, 206, 216, 226, 247-249, 253, 266, 286, 310-311, 326, 351-356-357, 410, 417, 524-525, 529, 699;

- Kraft: Kurowski 116, 195, 197, 220-221, 283-286, 293-296, 309, 312-315, 335, 340, 356-357, 410, 412-413, 414, 419, 427, 429-430, 529, 537-542, 688-744;
- Wing: Kurowski 108, 114-116, 134, 174, 183, 199-201, 204-205, 210-216, 218-219, 223-247, 250, 252-258, 260-261, 267-269, 286-292, 298-307, 315-320, 327-330, 336-339, 341-346, 365-366, 369-370, 373-386, 390-394, 403, 409, 420, 571-616, 745-780;
- Brzana: Kurowski 106, 109, 117, 120-122, 133, 135-147, 190-194, 207-209, 220-247, 249, 251, 253, 259, 262-266, 270-276, 279-280, 288, 304, 307-308, 321-329, 343-346, 349, 362-368, 400-407, 410, 413, 417-418, 420-423, 425-428, 516-523, 525-526, 529, 532-537, 543-544, 792-800;
- Kraft, Allen, & Brzana: Kurowski 105, 107, 112-113, 182-183, 185, 220-222, 276-280, 296-297, 310, 322, 331-334, 347-349, 367, 408, 421, 424, 530, 545-547;
- Benford: Kurowski 296, 319, 329-330, 365-366, 372, 411, 423, 425, 429, 525.

INTERROGATORY NO. 20: Explain how you writing letters to Jim Glasgow, or the Illinois Department of Professional Regulation as alleged in paragraphs 21, 22, 23, caused any injury to you.

ANSWER: Plaintiff objects to this Interrogatory as it requires a narrative response and is thus better suited for a deposition. Subject to and without waiving Plaintiff's general objections, and the aforementioned objection, Plaintiff states the following, the writing itself was not the issue that harmed her, it was the Defendants' actions after learning of the letter. Plaintiff reserves the right to supplement her responses.

INTERROGATORY NO. 21: Identify each act constituting the purported harassment alleged in paragraph 24 of the Complaint.

ANSWER: Plaintiff objects to this Interrogatory as it requires a narrative response and is thus better suited for a deposition. Subject to and without waiving Plaintiff's general objections, and the aforementioned objection, Plaintiff directs Defendants to the following. Investigation continues. Plaintiff reserves the right to supplement her responses.

- **ECW, Kraft, and Allen: Exhibits 1, 2, and 5-18 of the Complaint**
 - Kurwoski 116, 118, 124-132, 154-171, 175-179, 184-191, 196, 198, 281-283, 334, 623-686, 789-792;
- **Allen: Kurowski 201-203, 206, 216, 226, 247-249, 253, 266, 286, 310-311, 326, 351-356-357, 410, 417, 524-525, 529, 699;**
- **Kraft: Kurowski 116, 195, 197, 220-221, 283-286, 293-296, 309, 312-315, 335, 340, 356-357, 410, 412-413, 414, 419, 427, 429-430, 529, 537-542, 688-744;**
- **Wing: Kurowski 108, 114-116, 134, 174, 183, 199-201, 204-205, 210-216, 218-219, 223-247, 250, 252-258, 260-261, 267-269, 286-292, 298-307, 315-320, 327-330, 336-339, 341-346, 365-366, 369-370, 373-386, 390-394, 403, 409, 420, 571-616, 745-780;**
- **Brzana: Kurowski 106, 109, 117, 120-122, 133, 135-147, 190-194, 207-209, 220-247, 249, 251, 253, 259, 262-266, 270-276, 279-280, 288, 304, 307-308, 321-329, 343-346, 349, 362-368, 400-407, 410, 413, 417-418, 420-423, 425-428, 516-523, 525-526, 529, 532-537, 543-544, 792-800;**
- **Kraft, Allen, & Brzana: Kurowski 105, 107, 112-113, 182-183, 185, 220-222, 276-280, 296-297, 310, 322, 331-334, 347-349, 367, 408, 421, 424, 530, 545-547;**
- **Benford: Kurowski 296, 319, 329-330, 365-366, 372, 411, 423, 425, 429, 525.**

INTERROGATORY NO. 22: State with specificity exactly how you were harassed interfered with as alleged in paragraph 24.

ANSWER: Plaintiff objects to this Interrogatory as it requires a narrative response and is thus better suited for a deposition. Subject to and without waiving Plaintiff's general objections and the aforementioned objection, Plaintiff states that Defendants repeatedly called her business, workplace, family and published numerous articles about her. Plaintiff has lost esteem in the community of Bolingbrook, and her current community of Verde Ridge in Florida. Plaintiff reserves the right to supplement her responses.

- **ECW, Kraft, and Allen: Exhibits 1, 2, and 5-18 of the Complaint**
 - Kurwoski 116, 118, 124-132, 154-171, 175-179, 184-191, 196, 198, 281-283, 334, 623-686, 789-792;
- **Allen: Kurowski 201-203, 206, 216, 226, 247-249, 253, 266, 286, 310-311, 326, 351-356-357, 410, 417, 524-525, 529, 699;**
- **Kraft: Kurowski 116, 195, 197, 220-221, 283-286, 293-296, 309, 312-315, 335, 340, 356-357, 410, 412-413, 414, 419, 427, 429-430, 529, 537-542, 688-744;**
- **Wing: Kurowski 108, 114-116, 134, 174, 183, 199-201, 204-205, 210-216, 218-219, 223-247, 250, 252-258, 260-261, 267-269, 286-292, 298-307, 315-320, 327-330, 336-339, 341-346, 365-366, 369-370, 373-386, 390-394, 403, 409, 420, 571-616, 745-780;**
- **Brzana: Kurowski 106, 109, 117, 120-122, 133, 135-147, 190-194, 207-209, 220-247, 249, 251, 253, 259, 262-266, 270-276, 279-280, 288, 304, 307-308, 321-329, 343-346, 349, 362-368, 400-407, 410, 413, 417-418, 420-423, 425-428, 516-523, 525-526, 529, 532-537, 543-544, 792-800;**

- **Kraft, Allen, & Brzana: Kurowski 105, 107, 112-113, 182-183, 185, 220-222, 276-280, 296-297, 310, 322, 331-334, 347-349, 367, 408, 421, 424, 530, 545-547;**
- **Benford: Kurowski 296, 319, 329-330, 365-366, 372, 411, 423, 425, 429, 525.**

INTERROGATORY NO. 23: Identify how you were purportedly injured by the conduct you allege in paragraph 26 of the Complaint.

ANSWER: Plaintiff objects to this Interrogatory as it requires a narrative response and is thus better suited for a deposition. Subject to and without waiving Plaintiff's general objections, and the aforementioned objection, Plaintiff states that she has had numerous family members asking if she was lying; she has lost her job at JHT and it has cost her relationships, both professional and personal. Plaintiff reserves the right to supplement her responses.

INTERROGATORY NO. 24: Identify each defendant you claim surveilled you as alleged in paragraph 27 of your complaint.

ANSWER: Plaintiff objects to this Interrogatory as it requires a narrative response and is thus better suited for a deposition. Subject to and without waiving Plaintiff's general objections and the aforementioned objection, to the best of Plaintiff's knowledge and upon information and belief, Defendants John Kraft and Kirk Allen drove down to Florida to surveil her. Plaintiff reserves the right to supplement her responses.

INTERROGATORY NO. 25: Identify the publication alleging you were an atheist as alleged in paragraph 29 and state if you have ever held yourself out to be an atheist.

ANSWER: Subject to and without waiving Plaintiff's general objections, Plaintiff is attempting to locate the document, but she has never held herself out as an atheist, to the best of her knowledge. Plaintiff reserves the right to supplement her responses.

INTERROGATORY NO. 26: With respect to your allegation in paragraph 31 of your complaint explain with specificity how the purported statements referenced in subparagraphs a-o are false.

ANSWER: Plaintiff objects to this Interrogatory as it requires a narrative response and thus is better suited for a deposition. It requires Plaintiff to review and explain fourteen exhibits. Plaintiff reserves the right to supplement her responses.

INTERROGATORY NO. 27: Identify each specific threat that you believe has been made constituting your allegation of Cyberstalking in paragraphs, providing the specifics of who made the statement and the date the statement was made.

ANSWER: Plaintiff objects to this Interrogatory as it appears to be incomplete as it does not direct to what paragraphs were at issue. Further, Plaintiff objects to this Interrogatory as it requires a narrative response and is thus better suited for a deposition. Subject to and without waiving Plaintiff's general objections, and the aforementioned objections, please see documents. Plaintiff reserves the right to supplement her responses.

- **ECW, Kraft, and Allen: Exhibits 1, 2, and 5-18 of the Complaint**
 - **Kurwoski 116, 118, 124-132, 154-171, 175-179, 184-191, 196, 198, 281-283, 334, 623-686, 789-792;**

- Allen: Kurowski 201-203, 206, 216, 226, 247-249, 253, 266, 286, 310-311, 326, 351-356-357, 410, 417, 524-525, 529, 699;
- Kraft: Kurowski 116, 195, 197, 220-221, 283-286, 293-296, 309, 312-315, 335, 340, 356-357, 410, 412-413, 414, 419, 427, 429-430, 529, 537-542, 688-744;
- Wing: Kurowski 108, 114-116, 134, 174, 183, 199-201, 204-205, 210-216, 218-219, 223-247, 250, 252-258, 260-261, 267-269, 286-292, 298-307, 315-320, 327-330, 336-339, 341-346, 365-366, 369-370, 373-386, 390-394, 403, 409, 420, 571-616, 745-780;
- Brzana: Kurowski 106, 109, 117, 120-122, 133, 135-147, 190-194, 207-209, 220-247, 249, 251, 253, 259, 262-266, 270-276, 279-280, 288, 304, 307-308, 321-329, 343-346, 349, 362-368, 400-407, 410, 413, 417-418, 420-423, 425-428, 516-523, 525-526, 529, 532-537, 543-544, 792-800;
- Kraft, Allen, & Brzana: Kurowski 105, 107, 112-113, 182-183, 185, 220-222, 276-280, 296-297, 310, 322, 331-334, 347-349, 367, 408, 421, 424, 530, 545-547;
- Benford: Kurowski 296, 319, 329-330, 365-366, 372, 411, 423, 425, 429, 525.

INTERROGATORY NO. 28: State the factual basis for each statement contained within each of your publications attached as exhibits to the Complaint.

ANSWER: Plaintiff objects to this Interrogatory as it is confusing and can not be properly answered. Plaintiff further objects to this Interrogatory as it is too burdensome. To the extent that this Interrogatory can be answered, Plaintiff states that it requires a narrative response and is thus better suited for a deposition. Plaintiff reserves the right to supplement her responses.

Respectfully submitted,

BONNIE KUROWSKI

By: /s/Michelle LaGrotta
One of Plaintiff's Attorneys

Michelle LaGrotta
Thomas G. Gardiner
Hamza Jaka
Kasun Wijegunawardana
GARDINER KOCH WEISBERG &
WRONA
53 W. Jackson Blvd., Suite 950
Chicago, Illinois 60606
312.362.0000 (phone)
312.362.0440 (fax)
mlagrotta@gkwwlaw.com
tgardiner@gkwwlaw.com
hjaka@gkwwlaw.com
kwije@gkwwlaw.com
Attorneys for Plaintiff

LIST SET OF INTERROGATION
correct.

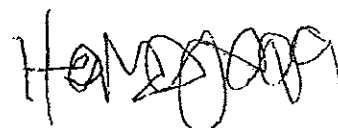
Date: 2.3.2022
B. Khumari

CERTIFICATE OF SERVICE

I certify that the foregoing copy of Plaintiff's Answers to Defendant's First Set of Interrogatories Pursuant to Federal Rules of Civil Procedure 33 was served on:

To: Robert T. Hanlon
Law Offices of Robert T. Hanlon & Assoc., P.C.
131 East Calhoun Street
Woodstock, Illinois 60098
Robert@robhanlonlaw.com
Illinois ARDC #6286331

The 3rd day of February 2022, via email.

A handwritten signature in black ink, appearing to read "Hamza Jaka", written in a cursive style.

Hamza Jaka