

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

| | | |
|---|---|----------------------------|
| BONNIE KUROWSKI |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | Case No. 1:21-cv-04363 |
| |) | |
| JOHN KRAFT, KIRK ALLEN, |) | |
| ALYSSIA BENFORD, CYNTHIA BRZANA, |) | Judge Feinerman |
| SHERI GRIMMENGA, KRISTINA WING, |) | Magistrate Judge Fuentes |
| BECKY BECKER, and EDGAR COUNTY |) | |
| WATCHDOGS, INC., an Illinois Corporation, |) | |
| |) | |
| Defendants |) | Jury Trial Demanded |
| |) | |

MOTION FOR SUMMARY JUDGMENT

Now Comes, Defendants, John Kraft, Kirk Allen, Alyssia Benford, Cynthia Brzana, Sheri Grimmenga, Kristina Wing, Becky Becker and Edgar County Watchdogs, Inc., an Illinois corporation, (Collectively the “Defendants”) by and through their attorney Robert T. Hanlon, with their Motion for Summary Judgment pursuant to F.R.C.P 56 and pursuant to the Illinois Citizen Participation Act, 735 ILCS 110, moves this court to enter judgement in Defendants favor and in support of this motion states as follows.

Incorporation of Defendant’s Local Rule 56.1 Statement.

Filed contemporaneously with this motion is Defendant’s Local Rule 56.1 Statement. Defendants incorporate by reference their 56.1 Statement of Facts as if fully set forth in this motion.

Incorporation of Defendants Memorandum of Law.

Filed contemporaneously with this motion is Defendants memorandum of law in support of this motion. Defendants incorporate by reference all of the arguments set forth in the accompanying memorandum of as if fully set forth in this motion.

Wherefore, for the reasons set forth in Defendants Rule 56.1 statement of facts and the accompanying memorandum of law, Defendants pray for the following relief:

- A) That this Court Dismiss Plaintiff's complaint with prejudice.
- B) That this court award attorney fees pursuant to the Citizen's Participation Act 735 ILCS 110 et seq.

Dated: April 19, 2022

Respectfully submitted,

John Kraft, Kirk Allen, Alyssia Benford,
Cynthia Brzana, Sheri Grimmenga, Kristina
Wing, Becky Becker and Edgar County
Watchdogs, Inc., an Illinois corporation.

/s/ Robert T. Hanlon
One of Defendants' Attorneys

Prepared by:
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CERTIFICATE OF SERVICE

I, Robert T. Hanlon, an attorney, do hereby certify that the foregoing document was served upon the following counsel of record by depositing same in the U.S. Mail, first class, pre-paid, on or before the hour of 5:00 p.m., from Woodstock, IL, this 19th day of April 2022 to the following counsel of record for Plaintiff Bonnie Kurowski:

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/s/Robert T. Hanlon
One of the Plaintiffs' Attorneys