









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

**MICHAEL E. HASTINGS,**

**Petitioner,**

**vs.**

**No. 22 MR 000232**

**Village of Frankfort, Illinois, A municipal,  
Corporation, the County of Will, a  
politie and corporate, John Does and  
Jane Does.**

**Respondent.**

**AMENDED ADDENDUM TO SUMMONS FOR VILLAGE OF FRANKFORT**

Village of Frankfort  
C/O Katie Schubert Clerk  
C/O Keith Ogle, President of the Board of Trustees  
342 Nebraska Street  
Frankfort, IL 60423

ARDC NO. 06206954  
Bernadette Garrison Barrett  
Attorney for Michael Hastings  
13500 Circle Drive, Suite 203  
Orland Park, Illinois 60462  
Phone 708.371.8500  
[info@thebarrettlawgroup.com](mailto:info@thebarrettlawgroup.com)

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

**Michael E. Hastings,**

**Petitioner,**

**v.**

**No. 2022 MR 232**

**Village of Frankfort, Illinois, a municipal  
Corporation, the County of Will, a body politic  
and corporate, John Does and Jane Does.**

**Respondents.**

**PETITIONER'S MOTION TO SCHEDULE HIS RULE 224 PETITION**

Petitioner Michael E. Hastings ("Petitioner"), by his attorneys, PAUL A. CASTIGLIONE, the KHOWAJA LAW FIRM, LLC, BERNADETTE GARRISON BARRETT and the BARRETT LAW GROUP, pursuant to Illinois Supreme Court Rule 224, hereby moves to schedule his Rule 224 Petition before this Honorable Court. In support of this motion, Petitioner states as follows:

1. On July 18, 2022, Petitioner filed his Rule 224 Petition with this Court. Summons was served on respondents Village of Frankfort (the "Village") and County of Will (the "County") (collectively "Respondents") on July 25, 2022. A copy of the Petition is attached.
2. Counsel for the County filed an appearance in this matter on August 23, 2022. No counsel has yet appeared for the Village.
3. As alleged in the Petition, Petitioner is the potential plaintiff in an action for defamation, false light invasion of privacy and related torts arising from the publication and dissemination of false statements of fact in a police report that the Frankfort Police Department prepared on or about June 20, 2021.
4. In connection with the Petition, Petitioner has prepared interrogatories and document requests for Respondents, copies of which are attached.

5. Petitioner asks this Honorable Court to issue an order granting him leave to serve the attached interrogatories and document requests on respondents Village of Frankfort and County of Will.

WHEREFORE, Petitioner Michael Hastings respectfully requests that this Honorable Court issue an order granting Petitioner leave to serve the attached interrogatories and document requests on respondents Village of Frankfort and County of Will.

Respectfully submitted,

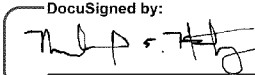
Michael E. Hastings

By: s/Paul A. Castiglione  
One of his attorneys

#### VERIFICATION

Under the penalties of perjury as provided by law pursuant to Section 1-109 of the Illinois Code of Civil Procedure, 735 ILCS 5/1-109, the undersigned certifies that the statements set forth in this instrument are true and correct to the best of my knowledge, except as to matters therein stated to be on information and belief and as to such matters, the undersigned certifies as aforesaid that he verily believes the same to be true.

DocuSigned by:



Michael E. Hastings

Paul A. Castiglione  
The Khowaja Law Firm, LLC  
8 South Michigan Avenue  
Suite 2600  
Chicago, Illinois 60603  
(312) 201-0575  
pcastig@khowajalaw.com  
ARDC No. 6197136

Bernadette Garrison Barrett  
The Barrett Law Group  
13500 Circle Drive  
Orland Park, Illinois 60462  
(708) 371-8500  
bernadette@thebarrettlawgroup.com  
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**No. 2022MR000232**

Andrea Lynn Chasteen  
Will County Circuit Clerk  
Twelfth Judicial Circuit Court  
Electronically Filed  
2022MR000232  
Filed Date: 8/26/2022 2:23 PM  
Envelope: 19258573  
Clerk: RR

**VERIFIED PETITION FOR DISCOVERY**

Petitioner Michael E. Hastings ("Petitioner"), by his attorneys, PAUL A. CASTIGLIONE, the KHOWAJA LAW FIRM, LLC, BERNADETTE GARRISON BARRETT and the BARRETT LAW GROUP, pursuant to Illinois Supreme Court Rule 224, requests this Honorable Court to enter an order authorizing Petitioner to obtain discovery from respondents the Village of Frankfort ("Frankfort"), the County of Will (the "County"), John Does and Jane Does (collectively "Respondents"), for the purpose of identifying responsible parties, and in support, states as follows:

1. Petitioner is the potential plaintiff in an action for defamation, false light invasion of privacy and related torts arising from the publication and dissemination of false statements of fact in a police report that the Frankfort Police Department prepared on or about June 20, 2021.

2. On June 20, 2021, Officer Kametas Dimitrios of the Frankfort Police Department responded to a call from Petitioner's wife, Kathleen Hastings, in which Ms. Hastings claimed to have had a verbal altercation with her husband, Petitioner. Ms. Hastings also falsely claimed that Petitioner previously battered her nearly eight months earlier and requested that a police report of her battery claim be prepared, but that she did not want police officers to speak with Petitioner about her battery claim or otherwise investigate her claim.

**Initial case management set for**  
**11/03/2022 at: 9:00 a.m.**



3. Officer Dimitrios prepared a police report with Incident # F1-21-0000939-001 (“Frankfort Police Department Report # F1-21-0000939-001”).

4. Ms. Hastings’ statements documented in Frankfort Police Department Report # F1-21-0000939-001 that Petitioner was emotionally and verbally abusive to her and that Petitioner battered her are false statements of fact.

5. In 2021 and/or 2022, Frankfort Police Department Report # F1-21-0000939-001 and the false statements of fact contained therein were published and disseminated to third-parties.

6. Frankfort Police Department had access to Frankfort Police Department Report # F1-21-0000939-001. In addition, the Laraway Communication Center -- a County department -- had access to Frankfort Police Department Report # F1-21-0000939-001.

7. On information and belief, Frankfort’s employees, John Does and/or Jane Does, and/or the County’s employees, John Does and/or Jane Does, are responsible for publishing and disseminating this information.

8. The Frankfort Police Department and/or the County keeps records regarding: (a) the police reports that the Frankfort Police Department creates, namely who electronically accesses them, prints copies, releases them to third-parties and (b) the identity of third-parties who receive them.

9. In order to pursue possible tort claims against those who deliberately disseminated and published false statements of fact to third-parties, Petitioner requires the discovery sought herein from Respondents Frankfort, the County, John Does and Jane Does.

10. Specifically, Petitioner seeks the entry of an order of authorization from this Honorable Court to issue interrogatories and document requests to discover from Respondents Frankfort, the County, John Does and Jane Does: (a) all information relating to employees of

Frankfort and/or the County providing third-parties with Frankfort Police Report F1-21-0000939-001 at any time in 2021 and/or 2022 and (b) all documents, including but not limited to audit logs, to show who accessed this police report and when they did so.

11. A copy of this Verified Petition and a summons in the form set forth in Supreme Court Rule 224 will be served upon Respondents.

WHEREFORE, petitioner Michael E. Hastings respectfully requests that this Honorable Court enter an order permitting the discovery requested herein for the purpose of ascertaining the identity of responsible person(s).

Respectfully submitted,

Michael E. Hastings

By: s/Paul A. Castiglione  
One of his attorneys

#### VERIFICATION

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**v.**

**No. 2022 MR 232**

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Corporation, the County of Will, a body politic  
and corporate, John Does and Jane Does.**

**Respondents.**

**FIRST SET OF INTERROGATORIES  
DIRECTED TO RESPONDENT VILLAGE OF FRANKFORT**

Petitioner Michael E. Hastings ("Petitioner"), by his attorneys, PAUL A. CASTIGLIONE, the KHOWAJA LAW FIRM, LLC, BERNADETTE GARRISON BARRETT and the BARRETT LAW GROUP, pursuant to Illinois Supreme Court Rules 213 and 224, propounds the following first set of interrogatories to be answered under oath by respondent Village of Frankfort within 30 days on or before September 6, 2022 :

**DEFINITIONS**

A. The word "Correspondence" means all Documents whereby communications are attempted or effectuated. "Correspondence" shall be given the broadest of possible construction.

B. The word "Document(s)" means all tangible or intangible media whereby information is recorded or communications are attempted or effectuated. "Documents" include but are not limited to electronic communications such as e-mail. "Documents" shall be given the broadest possible construction.

C. "Referring or relating to," "regarding" or "with regard to" shall mean consisting of, directly or indirectly mentioning or describing, pertaining to, reflecting upon a stated subject matter, or in any way logically or factually connected with the subject matter discussed.

D. The term "County" shall refer to the County of Will.

**exhibit**

- E. The term "Village" shall refer to the Village of Frankfort, Illinois.
- F. "Police Report" shall mean Frankfort Police Department Report # F121-000 939-001 .
- G. The term "Laraway" shall refer to Laraway Communication Center. A County Department.
- H. "Audit Log" shall refer to any log that the County or the Village kept in the ordinary course of business that recorded the names of persons who obtained copies of the Police Report and the date and time they obtained the Police Report.

### INSTRUCTIONS

- A. These interrogatories are continuing in nature and, thus, require the filing of supplemental answers if further or different information or documents become known to you or are obtained prior to trial.
- B. In answering these interrogatories, the County shall include all information available to it without regard to the admissibility of such information as evidence.
- C. These interrogatories extend to respondent County and all of its respective officers, directors, shareholders, employees, agents, elected officials, attorneys, lobbyists, consultants and all other persons acting on its behalf.
- D. When asked to identify a person, the County shall state such person's full name, last known address(es), employer, title, business affiliation and telephone number.
- E. When asked to identify a corporation or business entity, the County shall state such the present or last known name, address and telephone number of the corporation, partnership, firm, association, agency or other business entity, as well as any other names by which it has previously been known (either official or unofficial) and any other addresses at which it was previously found.

H. When asked to identify an event, transaction or occurrence, the County shall state its date, the place where it took place or will take place and its

J. When asked to identify a Document, the County shall provide a sufficient description to enable the County to locate or obtain such Document, or the County shall attach a copy of the Document to its answers.

K. If the County answers an interrogatory(s) by reference to Documents, the County shall provide reasonable identification of the Documents which are responsive to the interrogatory(s) or Rosemont shall attach copies of the Documents to its answers.

L. Unless otherwise specified, each interrogatory encompasses the time period from January 1, 2020 through the date of the County's answers.

M. If any information within the scope of any interrogatory is withheld on the basis of privilege, the County shall identify the persons who have knowledge of the privileged information and state the legal basis of the asserted privilege.

N. If any interrogatory or portion thereof is objected to or unanswered for any other reason, please fully state the nature of your objections.

O. The County shall seasonably supplement its answers to these interrogatories in accordance with Illinois Supreme Court Rule 213 and the expedited discovery schedule of the trial court.

#### **INTERROGATORIES**

1. Identify each person who has provided information to answer these interrogatories and identify the specific interrogatories for which each such person provided information. If more than one person assists or participates in answering any of the following questions, please indicate which specific question(s) each person assisted in answering.

#### **ANSWER:**

2. Identify all persons who accessed, viewed or printed a copy of the Police Report.

**ANSWER:**

3. Identify all persons who provided a copy of the Police Report to any person for any reason.

**ANSWER:**

4. Identify all persons listed on any Audit Log that shows who obtained and/or distributed a copy of the Police Report to any person for any reason.

**ANSWER:**

5. Identify all documents that show persons who accessed, viewed or printed a copy of the Police Report.

**ANSWER:**

6. Identify all documents that show persons who provided a copy of the Police Report to any person for any reason.

**ANSWER:**

7. Identify any and all Audit Logs that show who obtained and/or distributed a copy of the Police Report to any person for any reason.

**ANSWER:**

8. Identify: (a) all persons who received a copy of the Police Report from any Village employee or official and (b) the Village employee or official who provided them with the Police Report.

**ANSWER:**

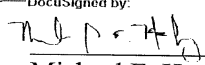
Respectfully submitted,

Michael E. Hastings

By: s/Paul A. Castiglione  
One of his attorneys

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ARDC No. 61 97136

Bernadette Garrison Barrett  
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**ANSWER:**

4. Identify all persons listed on any Audit Log that shows who obtained and/or distributed a copy of the Police Report to any person for any reason.

**ANSWER:**

5. Identify all documents that show persons who accessed, viewed or printed a copy of the Police Report.

**ANSWER:**

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**ANSWER:**

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**ANSWER:**

8. Identify: (a) all persons who received a copy of the Police Report from any County employee or official and (b) the County employee or official who provided them with the Police Report.

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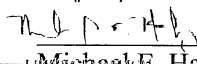
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**PETITIONER'S FIRST SET OF DOCUMENT  
REQUESTS TO RESPONDENT VILLAGE OF FRANKFORT**

Petitioner Michael E. Hastings ("Petitioner"), by his attorneys, PAUL A. CASTIGLIONE, the KHOWAJA LAW FIRM, LLC, BERNADETTE GARRISON BARRETT and the BARRETT LAW GROUP, pursuant to Illinois Supreme Court Rules 214 and 224, hereby request that respondent Village of Frankfort produce the documents specified below for inspection and copying, within 30 days on or before September 8, 2022:

**DEFINITIONS AND INSTRUCTIONS**

A. "Person" or "individual" shall mean any natural person, governmental agency or authority, or any other form of entity associated with any defendant.

B. "Related to" or "relating to" or "regarding" or "with regard to" shall mean directly or indirectly mentioning or describing, pertaining to, being connected with, or otherwise reflecting upon a stated subject matter.

C. "Document" or "documents" shall mean all originals, and all non-identical copies of originals whether different from the original by reason of any notation made on such copies or by any other reason, of writings or recordings of any kind or description, including without limitation correspondence, e-mails, text messages, any electronic transmission, memoranda, notes, diaries,

statistics, letters, orders, directives, interviews, telegrams, minutes, reports, studies, statements, transcripts, summaries, pamphlets, books, interoffice and intra-office communications, notations of any sort of conversations, telephone call, meetings or other communications, bulletins, printed matter, teletype, telefax, worksheets, or any other business records, and all drafts, alterations, modifications, changes and amendments of any foregoing, graphic or oral recordings or representations of any kind, whether produced by hand, machine, or any and all other methods of recording, including without limitation photographs, charts, graphs, microfiche, microfilm, videotape, records, motion pictures, and electronic or mechanical recordings or representations of any kind, including without limitation, tapes, cassettes, cartridges, discs, chips and records.

D. In answering this request for production of documents (the "Request"), the Village of Frankfort shall include all information available without regard to the admissibility of such information as evidence.

E. Terms in the plural include the singular and terms in the singular include the plural.

F. "And" includes the word "or," and "or" includes the word "and," and "all" includes the word "any," and "any" includes the word "all."

G. Unless otherwise specified, each document request encompasses the time period from January 1, 2020 through the date of the Village's answers.

H. The term "County" shall refer to the County of Will.

I. The term "Village" shall refer to the Village of Frankfort, Illinois.

J. "Police Report" shall mean Frankfort Police Department Report # F1-21-0000939-001.

K. The term "Laraway" shall refer to Laraway Communication Center. A County Department.

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#### **DOCUMENT REQUESTS**

1. Any documents that identify all persons who accessed, viewed or printed a copy of the Police Report.

**ANSWER:**

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**ANSWER:**

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**ANSWER:**

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**ANSWER:**



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**ANSWER:**

6. Any documents that identify: (a) all persons who received a copy of the Police Report from any Village employee or official and (b) the Village employee or official who provided them with the Police Report.

**ANSWER:**

7. An unredacted copy of the Police Report in its entirety.

**ANSWER:**

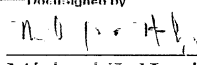
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D. In answering this request for production of documents (the "Request"), the County of Will shall include all information available without regard to the admissibility of such information as evidence.

E. Terms in the plural include the singular and terms in the singular include the plural.

F. "And" includes the word "or," and "or" includes the word "and," and "all" includes the word "any," and "any" includes the word "all."

G. Unless otherwise specified, each document request encompasses the time period from January 1, 2020 through the date of the County's answers.

H. The term "County" shall refer to the County of Will.

I. The term "Village" shall refer to the Village of Frankfort, Illinois.

J. "Police Report" shall mean Frankfort Police Department Report # F12-0000939-001.

K. The term "Laraway" shall refer to Laraway Communication Center. A County Department.

L. "Audit Log" shall refer to any log that the County or the Village kept in the ordinary course of business that recorded the names of persons who obtained copies of the Police Report and the date and time they obtained the Police Report.

#### **DOCUMENT REQUESTS**

1. Any documents that identify all persons who accessed, viewed or printed a copy of the Police Report.

#### **ANSWER:**

2. Any documents that identify all persons who provided a copy of the Police Report to any person for any reason.

#### **ANSWER:**

3. Any documents that identify all persons listed on any Audit Log that shows who obtained and/or distributed a copy of the Police Report to any person for any reason.

#### **ANSWER:**

4. Any documents that identify all documents that show persons who provided a copy of the Police Report to any person for any reason.

#### **ANSWER:**

5. Any documents that identify any and all Audit Logs that show who obtained and/or distributed a copy of the Police Report to any person for any reason.

**ANSWER:**

6. Any documents that identify: (a) all persons who received a copy of the Police Report from any County employee or official and (b) the County employee or official who provided them with the Police Report.

**ANSWER:**

7. An unredacted copy of the Police Report in its entirety.

**ANSWER:**

Respectfully submitted,

Michael E. Hastings

By: s/Paul A. Castiglione  
One of his attorneys

#### VERIFICATION

Under the penalties of perjury as provided by law pursuant to Section 1-10 9 of the Illinois Code of Civil Procedure, 735 ILCS 5/1-10 9, the undersigned certifies that the statements set forth in this instrument are true and correct to the best of my knowledge, except as to matters therein stated to be on information and belief and as to such matters, the undersigned certifies as aforesaid that he verily believes the same to be true.

\_\_\_\_\_  
Digitally signed by Michael E. Hastings  
Michael E. Hastings

Paul A. Castiglione  
The Khowaja Law Firm, LLC  
8 South Michigan Avenue  
Suite 200  
Chicago, Illinois 60603  
(312) 210-575  
pcastig@khowajalaw.com  
ARDC No. 619736

Bernadette Garrison Barrett  
The Barrett Law Group  
13500 Circle Drive  
Orland Park, Illinois 60462  
(708) 371-8500  
bernadette@thebarrettlawgroup.com  
ARDC No. 06206954