

All Domestic Relations cases will be heard by phone or video.
Go to <http://www.cookcountycourt.org/LinkClick.aspx?fileticket=G7A8KAcSi8E%3d&portalid=0>
to get more information and Zoom Meeting IDs.



Megan M <megan42@gmail.com>
FILED
11/30/2021 9:32 AM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2016D009534

*I'm not an attorney. I didn't know I needed to label exhibits on the document as well as the file name at the time I drafted this petition. Labels added.

IRMO Matt; 2016 D 9534; COURT ORDER

John Palen <jpalen@johnpalenphd.com>
To: "Kaye Mason (Chief Judge's Office)" <kaye.mason@cookcountyil.gov>, Megan Mason <[REDACTED]>
Christopher Wehrman <cwehrman@smbtrials.com>
Cc: Laura Fried <lfried@smbtrials.com>, Michael I Bender <mbender@caesarbenderlaw.com>

Sat, Dec 11, 2021 at 1:53 PM
15725159

I want to be paid. It is as simple as that

JOHN M. PALEN, PH.D., LCSW

<http://www.johnpalenphd.com>

- Psychotherapy with Older Children, Adolescents, Adults and Families
- Therapy with Children Resisting Contact with a Parent
- Co-Parenting Counseling
- Parenting Plan Consultation/Child Custody Evaluation
- Individual and Family Counseling with Members of the LGBTQ Community and their Families.
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5225 Old Orchard Road, Suite One

Skokie, Illinois 60077

T: 847-967-1695

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FILED DATE: 11/30/2021 9:32 AM 2016D009534

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EXHIBIT B

Megan M <[REDACTED]>
FILED 11/30/2021 9:32 AM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2016D009534

IRMO Matt; 2016 D 9534; COURT ORDER

John Palen <jpalen@johnpalenphd.com>
To: "Kaye Mason (Chief Judge's Office)" <kaye.mason@cookcountyil.gov>, Megan Mason <[REDACTED]>
Christopher Wehrman <cwehrman@smbtrials.com>
Cc: Laura Fried <lfried@smbtrials.com>, Michael I Bender <mbender@caesarbenderlaw.com>

Sat, Dec 4, 2020 at 1:58 PM
15725159

Sorry- this was meant for another case. I had not noticed Ms. Mason on the list of recipients.

Regards,

John Palen

[Quoted text hidden]

FILED DATE: 11/30/2021 9:32 AM 2016D009534

Hearing Date

3 messages

Megan Mason 

Thu, May 27, 2021 at 12:16 PM

To: "Kaye Mason (Chief Judge's Office)" <kaye.mason@cookcountyil.gov>

Cc: "DomesticRelDiv Services (Circuit Court)" <domesticreldivservices@cookcountycourt.com>

Hi Ms. Mason,

I would like a date to present three petitions and one motion to Judge Johnson and to schedule a hearing date. Attached are the petitions and motion, responses from OC and my responses to OC. These matters are separate from other issues being brought for status in the near future and related to ongoing, clear violation of the parenting plan, so I would greatly appreciate the opportunity to present them and set a trial in the near future.

Does Judge Johnson have any availability the week of June 7?

Kindly,
Megan Mason
2016 D

16 attachments

















-  **PRTSC Strange Adults in Children's home stamped.pdf**
213K
-  **POS Response to Affirmative Defense PRTSC RE Strange Adults in Children's Home.pdf**
542K
-  **Matt - response to PRSC re Adults - final (1).pdf**
1861K
-  **PRTSC Re Failure to Supervise Children.docx - Google Docs (2).pdf**
241K
-  **Matt - response to PRSC re Childcare - final.pdf**
1736K
-  **PROOF OF SERVICE FILED Response to Affirmative Defense PRTSC RE Failure to Supervise Children.pdf**
542K
-  **PRTSC Re Harassment .pdf**
217K
-  **Matt - response to PRSC re Harassment - final (1).pdf**
2121K
-  **ANSWERRESPONSEREPLY Response to Affirmative Defense to Megan Mason's PRTSC and Motion to Compel_ RE Failure to provide child care and failure to adress children's safety.docx - Google Docs copy.pdf**
173K
-  **MotionToModifyAllocation_0.pdf**
684K
-  **Matt - response to motion to modify - final (1).pdf**
2112K
-  **POS Response to Affirmative Defense to Megan Mason's Motion to Modify Parenting Responsibility.pdf**
542K
-  **Response to Affirmative Defense to Megan Mason's PRTSC and Motion to Compel_ RE Strange Adults in Children's Home.docx - Google Docs.pdf**
164K

EXHIBIT C

-  **PROOF OF SERVICE FILED Response to Affirmative Defense PRTSC RE Failure to Supervise Children.pdf**
542K
-  **Response to Affirmative Defense to Megan Mason's PRTSC and Motion to Compel_ RE Harassment and Failure to Adhere to the Parenting Plan.pdf**
173K
-  **Response to Affirmative Defense to Megan Mason's Motion to Modify Allocation of Parental Responsibilities.docx - Google Docs (1).pdf**
137K

Kaye Mason (Chief Judge's Office) <kaye.mason@cookcountyil.gov>
To: Megan Mason [REDACTED]

Thu, May 27, 2021 at 12:25 PM

Good afternoon Ms Mason

Please be guided by the attached Administrative Order for guidelines on requesting dates for newly filed Motions

Best,

Kaye Mason, Coordinator
Calendar 23 - Judge Robert W. Johnson
Domestic Relations Division

EMAIL COMMUNICATION to court personnel and judges shall be limited to scheduling and administrative purposes and shall not include information relating to the substantive matters or the issues on the merits. If email communication includes any language that could be construed as impermissible ex parte communication, neither court personnel nor judges will respond to the email.

From: Megan Mason [REDACTED]
Sent: Thursday, May 27, 2021 12:16 PM
To: Kaye Mason (Chief Judge's Office) <kaye.mason@cookcountyil.gov>
Cc: DomesticRelDiv Services (Circuit Court) <DomesticRelDivservices@cookcountycourt.com>
Subject: Hearing Date

External Message Disclaimer

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[Quoted text hidden]


-
-  **AO 2020 D 13 Amended.pdf**
1162K

EXHIBIT C

Thu, May 27, 2021 at 12:41 PM

Megan Mason

To: "Kaye Mason (Chief Judge's Office)" <kaye.mason@cookcountyil.gov>

Cc: Christopher Wehrman <cwehrman@smbtrials.com>, "DomesticRelDiv Services (Circuit Court)" <domesticreldivservices@cookcountycourt.com>

Hi Ms. Mason,

Thanks for your response. I have served OC, OC has responded, I have responded to the affirmative defense. I am copying Mr. Wehrman here as I believe we are at this step:

"After the time to reply expires, the movant shall submit the non-emergency motion and any responses and replies to the Circuit Court (along with all necessary and referenced exhibits) via e-mail transmission with all counsel of record or self-represented parties included as recipients of the e-mail to the following individuals at the date that time to reply expires:
the Court Coordinator for any judge who maintains an individual calendar, or
i. the Division Administrator for any judge who does not have a Court Coordinator, or;
ii. any other method directed by the judge assigned to the matter."

May I please have a date to present the pleadings?

Thanks,
Megan Mason

[Quoted text hidden]

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EXHIBIT C

Megan M <[REDACTED]>
11/30/2021 9:32 AM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2016D009534
Calendar, 23

Re: MATT 16 D 9534 Request for Hearing Date

8 messages

Kaye Mason (Chief Judge's Office) <kaye.mason@cookcountyil.gov>

Thu, May 27, 2021 at 12:56 PM

To: Megan Mason <[REDACTED]>

Cc: Christopher Wehrman <cwehrman@smbtrials.com>

Hi again

Please remember to include your case name and number on all submissions to the court.

The first available hearing date is July 27 at 11 am. Kindly advise of your availability

Kaye Mason, Coordinator
Calendar 23 - Judge Robert W. Johnson
Domestic Relations Division

EMAIL COMMUNICATION to court personnel and judges shall be limited to scheduling and administrative purposes and shall not include information relating to the substantive matters or the issues on the merits. If email communication includes any language that could be construed as impermissible ex parte communication, neither court personnel nor judges will respond to the email.

From: Megan Mason <[REDACTED]>
Sent: Thursday, May 27, 2021 12:41 PM
To: Kaye Mason (Chief Judge's Office) <kaye.mason@cookcountyil.gov>
Cc: Christopher Wehrman <cwehrman@smbtrials.com>; DomesticRelDiv Services (Circuit Court) <DomesticRelDivservices@cookcountycourt.com>
Subject: Re: Hearing Date

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Hi Ms. Mason,

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FILED DATE: 11/30/2021 9:32 AM 2016D009534

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EXHIBIT E

Megan M <[REDACTED]>
11/30/2021 9:32 AM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2016D009534
Calendar, 23

Re: MATT 16 D 9534 Request for Hearing Date

8 messages

Kaye Mason (Chief Judge's Office) <kaye.mason@cookcountyil.gov>

Thu, May 27, 2021 at 12:56 PM

To: Megan Mason <[REDACTED]>

Cc: Christopher Wehrman <cwehrman@smbtrials.com>

Hi again

Please remember to include your case name and number on all submissions to the court.

The first available hearing date is July 27 at 11 am. Kindly advise of your availability

Kaye Mason, Coordinator
Calendar 23 - Judge Robert W. Johnson
Domestic Relations Division

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From: Megan Mason <megan42@gmail.com>
Sent: Thursday, May 27, 2021 12:41 PM
To: Kaye Mason (Chief Judge's Office) <kaye.mason@cookcountyil.gov>
Cc: Christopher Wehrman <cwehrman@smbtrials.com>; DomesticRelDiv Services (Circuit Court) <DomesticRelDivservices@cookcountycourt.com>
Subject: Re: Hearing Date

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Hi Ms. Mason,

Thanks for your response. I have served OC, OC has responded, I have responded to the affirmative defense. I am copying Mr. Wehrman here as I believe we are at this step:

"After the time to reply expires, the movant shall submit the non-emergency motion and any responses

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EXHIBIT E

Megan M <[REDACTED]>
11/30/2021 9:32 AM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2016D009534

Re: MATT 16 D 9534 Request for Hearing Date

Christopher Wehrman <cwehrman@smbtrials.com>

Thu, May 27, 2021 at 1:08 PM
Calendar

To: Megan Mason <[REDACTED]> "Kaye Mason (Chief Judge's Office)" <kaye.mason@cookcountyil.gov>

Cc: Michael I Bender <mbender@caesarbenderlaw.com>

Kaye:

When we were before the Judge on Monday, he appointed at 604 evaluator and set everything for status on July 13, 2021. I do not believe Judge Johnson is having any hearings on this case at this time.

Chris

Christopher D. Wehrman | Partner

Swanson, Martin & Bell, LLP

330 N. Wabash #3300

Chicago, IL 60611

Office: 312/321-9100

Direct: 312/222-8534

Fax: 312/321-0990

[Quoted text hidden]

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FILED DATE: 11/30/2021 9:32 AM 2016D009534

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EXHIBIT F

Megan M <[REDACTED]>

11/30/2021 9:32 AM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2016D009534

Re: MATT 16 D 9534 Request for Hearing Date

Kaye Mason (Chief Judge's Office) <kaye.mason@cookcountyil.gov>

Thu, May 27, 2021 at 1:15 PM
Calendar 23
15765159

To: Christopher Wehrman <cwehrman@smbtrials.com>, Megan Mason <[REDACTED]>

Cc: Michael I Bender <mbender@caesarbenderlaw.com>

The judge is in a hearing but I will verify before the end of the day

Kaye Mason, Coordinator
Calendar 23 - Judge Robert W. Johnson
Domestic Relations Division

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From: Christopher Wehrman <cwehrman@smbtrials.com>

Sent: Thursday, May 27, 2021 1:08 PM

To: Megan Mason <[REDACTED]> Kaye Mason (Chief Judge's Office)
<kaye.mason@cookcountyil.gov>

Cc: Michael I Bender <mbender@caesarbenderlaw.com>

Subject: RE: MATT 16 D 9534 Request for Hearing Date

[Quoted text hidden]

FILED DATE: 11/30/2021 9:32 AM 2016D009534

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EXHIBIT G

Megan M <[REDACTED]>
11/30/2021 9:32 AM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2016D009534

Re: MATT 16 D 9534 Request for Hearing Date

Kaye Mason (Chief Judge's Office) <kaye.mason@cookcountyil.gov> Thu, May 27, 2021 at 2:10 PM
To: Megan Mason <[REDACTED]> Christopher Wehrman <cwehrman@smbtrials.com> 15765159
Cc: Michael I Bender <mbender@caesarbenderlaw.com>

Ms Matt

I just spoke with Judge Johnson and he has indicated that he will not be hearing any other issues on this case until he has heard from the evaluator.

Please be guided accordingly.

[Quoted text hidden]

FILED DATE: 11/30/2021 9:32 AM 2016D009534

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EXHIBIT H

Megan M [REDACTED]

11/30/2021 9:32 AM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2016D009534

IRMO Matt; 2016 D 9534; COURT ORDER

Kaye Mason (Chief Judge's Office) <kaye.mason@cookcountyil.gov> Thu, Dec 2, 2021 at 12:44 PM
To: Megan Mason [REDACTED] Christopher Wehrman <cwehrman@smbtrials.com> 15765159
Cc: Laura Fried <lfried@smbtrials.com>, Michael I Bender <mbender@caesarbenderlaw.com>, John Palen <jpalen@johnpalenphd.com>

Please do not include me (Coordinator) in correspondence between counsels and litigants

Kaye Mason
Coordinator
Domestic Relations Division

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From: Megan Mason [REDACTED]
Sent: Thursday, December 3, 2020 12:35 PM
To: Christopher Wehrman <cwehrman@smbtrials.com>
Cc: Kaye Mason (Chief Judge's Office) <kaye.mason@cookcountyil.gov>; Laura Fried <lfried@smbtrials.com>; Michael I Bender <mbender@caesarbenderlaw.com>; John Palen <jpalen@johnpalenphd.com>
Subject: Re: IRMO Matt; 2016 D 9534; COURT ORDER

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[Quoted text hidden]

FILED DATE: 11/30/2021 9:32 AM 2016D009534

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Megan M <[REDACTED]>
11/30/2021 9:32 AM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2016D009534
Wed, Apr 14, 2022 at 10:31 AM
15765159

EXHIBIT I

Invoice

Megan Mason <[REDACTED]>
To: Brad Trowbridge <brad@bradtrowbridge.com>

Hi Brad,

I hope you're well and your clients are not suffering too badly from the quarantine. I'm personally quite pleased that no motions are being filed right now, a nice break =).

Please run the attached cc for the \$200 balance.

Thanks,
Megan
[Quoted text hidden]

FILED DATE: 11/30/2021 9:32 AM 2016D009534

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EXHIBIT J

Megan M <[REDACTED]>

11/30/2021 9:32 AM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2016D009534

Invoice

Brad Trowbridge <brad@bradtrowbridge.com>
To: Megan Mason <[REDACTED]>

Wed, Apr 14, 2021 at 11:19 AM
Gale, 2021
15765159

Hi Megan. Yes, unfortunately, it took a pandemic to stop Peter's legal abuse of you! I don't think there's a cc attached unless there's a glitch on my end. Stay well!

Brad Trowbridge
The Law Offices of Bradley R. Trowbridge
3257 N. Sheffield Suite 104
Chicago, IL 60657
P: 773-784-9900
E: brad@bradtrowbridge.com

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[Quoted text hidden]

FILED DATE: 11/30/2021 9:32 AM 2016D009534

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Exhibit L

Megan M [REDACTED]
11/30/2021 9:32 AM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2016D009534
Calendar, 23

Re: New Bill from Caesar & Bender, LLP

13 messages

Brad Trowbridge <brad@bradtrowbridge.com>
To: Megan Mason <[REDACTED]>

Mon, Jul 15, 2020 at 12:37 PM

We had a zoom court date of July 6 that I had on my calendar as July 7. That could have only have been for a short time. I also don't know how much preparation there could have been. It looks like a lot of activities have been lumped into one line item. The next zoom date is July 20 at 9 AM. Anything I need to know?

On Sun, Jul 12, 2020, 12:25 PM Megan Mason <[REDACTED]> wrote:
Zoom court? What?

----- Forwarded message -----
From: **Caesar & Bender, LLP** <notifications@clio.com>
Date: Sun, Jul 12, 2020 at 12:18 PM
Subject: New Bill from Caesar & Bender, LLP
To: Megan Mason <[REDACTED]>



Caesar & Bender, LLP

Dear Megan Mason,
Your bill is ready. You can view it in the attachment.

Account summary

Amount due on Invoice 4768	\$455.00
Due date: 07/12/2020	
Amount due on 3 other invoices	\$1,333.50
Total amount due	\$1,788.50

[Pay online now](#)

The payment link will expire in 90 days upon receipt.

FILED DATE: 11/30/2021 9:32 AM 2016D009534



Exhibit O

Megan M [REDACTED]

Court

Megan Mason [REDACTED]

Mon, Jul 20, 2020 at 2:46 PM

To: Brad Trowbridge <brad@bradtrowbridge.com>

Hi Brad,
Did Michael make a motion to be removed? Anything filed against me?
M

All Domestic Relations cases will be heard by phone or video.
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to get more information and Zoom Meeting IDs.



EXHIBIT M

Megan M [REDACTED]

11/30/2021 9:32 AM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2016D009534

Re: New Bill from Caesar & Bender, LLP

Brad Trowbridge <brad@bradtrowbridge.com>
To: Megan Mason [REDACTED]

Mon, Jul 20, 2020 at 9:15 AM
15765159

Peter filed this and it was supposed to be up in April when courts were closed. We were given time today to respond to it so I need input from you about how to respond.

Brad Trowbridge
The Law Offices of Bradley R. Trowbridge
3257 N. Sheffield Suite 104
Chicago, IL 60657
P: 773-784-9900
E: brad@bradtrowbridge.com

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[Quoted text hidden]

 **PRTSC.pdf**
604K

FILED DATE: 11/30/2021 9:32 AM 2016D009534

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to get more information and Zoom Meeting IDs.



Megan M <[REDACTED]>

EXHIBIT N

Can you catch me up on status with Michael Bender?

Brad Trowbridge <brad@bradtrowbridge.com>
To: Megan Mason <[REDACTED]>

11/30/2021 9:32 AM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2016D009534
Wed, Jan 13, 2023 at 3:28 PM
Calendar
15765159

Bender already told the judge this would be his last request for a continuance if no one files anything.
[Quoted text hidden]

FILED DATE: 11/30/2021 9:32 AM 2016D009534

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|
EXHIBIT P
 THE LAW OFFICES OF
BRADLEY R. TROWBRIDGE
 3257 NORTH SHEFFIELD AVENUE, SUITE 104
 CHICAGO, ILLINOIS 60657

FILED
 11/30/2021 9:32 AM
 IRIS Y. MARTINEZ
 CIRCUIT CLERK
 COOK COUNTY, IL
 2016D009534
 Calendar, 23
 15765159

INVOICE: MEGAN MASON

DATE	EE	ACTIVITY	DESCRIPTION	RATE	HOURS	LINE TOTAL
6/13/19	BT	Payment				
6/14/19	BT	Time Charge				
7/9/19	BT	Time Charge				
7/14/19	BT	Time Charge				
7/20/19	BT	Time Charge				
7/20/19	BT	Time Charge				
7/24/19	BT	Time Charge				
7/25/19	BT	Time Charge				
7/29/19	BT	Time Charge				
8/5/19	BT	Time Charge				
8/29/19	BT	Time Charge				
9/16/19	BT	Time Charge				

FILED DATE: 11/30/2021 9:32 AM 2016D009534

9/18/19	BT	Time Charge				
11/20/19	BT	Time Charge				
11/19/19	BT	Time Charge				
1/13/19	BT	Time Charge				
1/14/20	BT	Time Charge				
2/24/20	BT	Time Charge				
2/24/20	BT	Time Charge				
3/2/20	BT	Time Charge				
3/10/20	BT	Time Charge	Review Petition for Rule to Show Cause	\$300.00	.10	-\$30.00

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Megan M

11/30/2021 9:32 AM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2016D009534

EXHIBIT Q

Missing records, please send

Brad Trowbridge <brad@bradtrowbridge.com>
To: Megan Mason <[REDACTED]>

Fri, Jul 1, 2023 at 9:49 AM
Calendar 23
15765159

I've attached the Notice of Motion. Although the Notice states the Motion was going to be presented on March 20, 2020, there was no court on March 20, 2020, as courts were closed due to the pandemic. Once we returned to court in July, the judge set the Motion for hearing on August 20, 2020. I sent you the Motion. You obviously knew about the Motion. I worked with you to file a Response to the Motion. We spent considerable time amending it before I filed it. We prepared for a hearing, and a hearing was conducted on August 20, 2020. You were present and testified at the hearing. Again, the Notice is not substantive. You're claiming you didn't receive a Notice for a court date that never occurred.

Finally, it's untrue that I failed to send you "a lot." I sent you everything. Relying on the Clerk's website is not going to help you put together your file. First, there are some things on your list for which documents do not exist. Second, as I explained, they make errors. They report a law firm that wasn't part of the case filed documents. They also report they sent you a postcard on March 20, 2020. They had you listed as representing yourself (Pro Se), although you weren't. They also report they sent me "electronic notice," but I didn't receive anything. I assume the postcard and electronic notice was just notifying everyone that there would be no court on March 20, 2020.

[Quoted text hidden]

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PM

Peter >

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11/30/2021 9:32 AM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2016D009534
Calendar, 23
15765159

I am coming now

EXHIBIT S

Yesterday 3:41 PM

I will pick them up in 10mins

Are you ok with me getting a new ABA provider? They continue dragging their feet providing services because of covid, while many other providers work.

Today 11:23 AM

Please respond

I'll note this in Talking Parents

You may have your attorney contact my attorney if you need anything else from me

Camera App Store Text Message Send

App Store App Store Apple Pay Search Health YouTube

EXHIBIT T

Introduction

This matter requires this Court's urgent attention as the safety of two minor children, Angus and Theodore Matt, are at risk due to continued negligence and disregard for the September 27, 2017 Allocation Judgment, specifically as it pertains to strange adults living in the children's residence.

Background

1. The parties were divorced on September 27, 2017. Two children were born during the marriage, namely: A [REDACTED] (age 10) and T [REDACTED] (age 8).

2. Also on September 27, 2017, the Court entered an Allocation Judgment, which incorporated the parties' Parenting Plan. Paragraph 9 of the Parenting Plan provides, in no uncertain terms:

"Both parents shall update the other parent in writing of any changes of the individuals living in their residence as soon as such an arrangement is known. Each party will keep the other informed of the current cell phone number of any person residing with the party and any childcare provider of the minor children".

See Paragraph 9 of the Parenting Plan incorporated into the Allocation Judgment, which is attached as **Exhibit A**.

3. The parties' children A [REDACTED] (12) and T [REDACTED] (9) spend 50% of their parenting time at Peter Matt's single family residence [REDACTED]

4. On at least three occasions housed room-mates at [REDACTED] in exchange for rent or labor for extended periods of time.

5. Mr. Matt intends to convert his home to a boarding house with three tenants.

6. In 2017 the boys informed Megan that their friend Luke's dad was living on their couch. Peter never mentioned this fact to Megan.

EXHIBIT T

7. On April 29, 2020 the boys informed Megan that they had a new roommate named Amapoul.

8. On April 29, 2020 Megan asked Peter to please tell her the name of his new room-mate. In direct violation of the Allocation Order paragraph 9 Mr. Matt refused **(Exhibit B)**

9. Megan also asked for an id and more information about the man living with her children, such as his occupation or how Peter knew him. Peter refused. This refusal is in direct violation of the Allocation Order paragraph 14 which requires each party to *“respect the other party’s primary role as the Children’s mother and father”*.

10. It is entirely reasonable for the mother of minor children to inquire as to which strange adults are spending extended periods of time with her children, to inquire as to their background and safety around children. Mr. Matt’s obstinate refusal to provide information to Megan about the life of her children violates the Allocation Order.

11. One tenant named Pablo Gonzales currently lives with Mr. Matt and, for 50% of Court allocated Parenting time, lives with the minor children. Mr. Gonzales works as a day laborer for Mr. Matt doing unpermitted electrical, plumbing and construction renovations on the property at [REDACTED] Mr. Matt gives Mr. Gonzales boarding in exchange for labor.

12. In December 2020 T [REDACTED] informed Megan that they had a new roommate in their house named Pablo. On December 26, 2020, Megan messaged Mr. Matt on the Talking Platform and asked for more information about his roommate. Mr. Matt refused to provide details about his roommate **(Exhibit D)**

13. Megan emailed Mr. Matt on December 29, 2020 and asked him to comply with the order and tell her the last name and phone number of his roommate. **(Exhibit E)**.

EXHIBIT T

14. On December 29, 2020 Mr. Matt deceitfully claimed that Mr. Gonzales was not living in his residence, claiming “they have their own additional entrance, own kitchen, own washer and dryer etc.. **(Exhibit J)**

15. In an email on January 12, 2021, Dr. John Palen, PC, instructed Mr. Matt to comply with the MSA, stating, “Peter, in order to avoid more court expenses and stress, please provide Megan with what the JPA stipulates you (and she) must provide the other about housemates. This shouldn’t be this difficult.” **(Exhibit F)**

16. On January 12, 2021, Mr. Matt again made the deceitful claim that Mr. Gonzales is not a roommate and that the MSA does not apply to his lodger, again refusing to provide full name and phone number **(Exhibit G)**

17. In fact Mr. Gonzales lives inside the residence in the room next to the minor children, formerly Megan and Mr. Matt’s marital bedroom as shown in a picture provided by Mr. Matt as an attachment to his email on January 12, 2021. **(Exhibit C)**.

18. In a Zoom meeting with Dr. John Palen, the Court Appointed Parenting Coordinator in this Case, and Megan, on January 14, 2021, Mr. Matt finally admitted to Dr. Palen and Megan that he has a roommate but initially refused to provide his last name.

19. When ordered to do so by Dr. Palen, Mr. Matt told Megan Mr. Gonzales’s name.

20. When ordered to do so by Dr. Palen, Mr. Matt gave Megan what he claimed was Mr. Gonzales’s phone number: [REDACTED]

21. On January 12, 2021, Megan dialed the number provided for Mr. Gonzales but received a message that the number was no longer in service. When Megan attempted to call again the phone did not ring. **(Exhibit H)**.

22. A search of the number 773-660-0960 indicates that it is the phone number of a 77 year old woman named Jenetta Sowell **(Exhibit I)**.

EXHIBIT T

23. Mr. Matt remains bizarrely contemptuous of the allocation order, and has still not provided a valid phone number for Mr. Gonzales.

24. In a zoom meeting with their younger son's therapist, Amanda Whitlock, on February 9, 2021, Ms. Whitlock asked both parents if any other adults live in their respective homes. Mr. Matt said he has one roommate and he's going to have more, for a total of three boarders.

25. In a Zoom meeting with Dr. John Palen, the Court Appointed Parenting Coordinator in this Case, and Megan, on March 10, 2021, Megan asked Mr. Matt if he really means to take on three boarders. Mr. Matt admitted that he is renovating his home to house a total of three boarders. Mr. Matt explained in detail to Dr Palen and Megan his plan to renovate his home to contain three apartments with their own washers and dryers, electric stoves, bathrooms and beds to rent out to boarders. He admitted that he has not applied for permits for any of the construction in the Village of Wilmette and confirmed that his home is zoned for single-family use only, but he believes he can have up to three non-family adults living in the home according to local ordinance.

26. Megan asked that Mr. Matt please get the home inspected by the Village of [REDACTED] and get permits in order to ensure the safety of the children, particularly as Mr. Matt is building kitchens and dryers in the units. Mr. Matt refused.

27. Megan asked Mr. Matt to please give her a copy of Mr. Gonzales's id and a real phone number. Mr. Matt refused.

28. Mr. Matt has at no point demonstrated that he understands either the safety issue related to the minor children or Megan's right to care and inquire about their safety. He has argued exhaustively about details and semantics but not acknowledged or shown an ability to

EXHIBIT T

feel concern for the children's well being. It is questionable if Mr. Matt is competent to make parenting decisions that impact the safety and well-being of the children.

29. Mr. Matt remains in violation of the MSA.

WHEREFORE, MEGAN MATT, requests that this Court enter an Order:

A. Enforcing the Allocation Judgment paragraph 9 that Peter Matt provide information about individuals living in his home;

B. Enforcing the Allocation Judgment paragraph 14 that Peter Matt respect Megan's role as the children's mother;

C. Issuing a rule, returnable *instanter*, requiring Peter to show cause why he should not be held in indirect civil contempt for his failure to comply with the Allocation Judgment;

D. Finding Peter to be in indirect civil contempt for his failure to comply the Allocation Judgment;

E. Modifying the Allocation Order as follows:

“In the event that either Parent intends to give an adult access to the children's living space, as a roommate, long-term guest, tenant, boarder, romantic partner, live-in employee, or other type of resident not mentioned, that Parent must inform the other Parent *in advance* of the individual moving into the home with the minor children. “Access” shall be defined as any of the following: having a key to the children's residence, sleeping in any part of the children's residence on a regular basis, using the children's address as his or her home address.

Furthermore, in advance of this person residing at the particular family residence, the host Parent shall provide the other parent with an id for the person residing with the children. The host Parent shall also conduct a soft criminal background check at his or her own expense on the proposed resident and provide this to the other Parent. If the background check shows criminal convictions the other Parent may demand that this person not reside with the children. If the host Parent fails to provide this documentation in advance of the new resident moving in he or she shall be in violation of this Order and in Contempt. If the host Parent refuses to deny a proposed resident with a criminal background occupancy with the children, that parent shall be in violation of this Order and in Contempt.”

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F. Ordering Peter to comply with the Allocation Judgment and;

G. Ordering Mr. Matt to get permits from the Village of Wilmette for all electrical, plumbing and major construction work on the home at [REDACTED] within 45 days;

H. Ordering Mr. Matt to run a soft background check on Mr. Gonzales for any criminal violations within 30 days;

I. Ordering Mr. Matt to get his home zoned as multi-family before taking on paid boarders;

J. Requiring Peter to reimburse Megan for lost wages do to the exhaustive efforts to resolve this matter, calculated as hour spent in researching, drafting and filing documents in this matter at a rate of her current annual salary (\$72,000) adjusted to an hourly rate of \$36 per hour, pursuant to Illinois Rule 137; and

K. For such further relief as this Court deems appropriate.

Respectfully submitted,



MEGAN MASON

EXHIBIT T

Introduction

This matter requires this Court’s urgent attention as the safety of two minor children, A [REDACTED] and T [REDACTED] Matt, are at risk due to continued negligence and disregard for the September 27, 2017 Allocation Judgment, specifically as it pertains to childcare for the two minor children.

Background

1. The parties were divorced on September 27, 2017. Two children were born during the marriage, namely: A [REDACTED] (age 10) and T [REDACTED] (age 8).

2. Also on September 27, 2017, the Court entered an Allocation Judgment, which incorporated the parties’ Parenting Plan (**Exhibit A.**).

3. Paragraph 1 of the Parenting Plan provides, in no uncertain terms:
“The parties agree that, from time to time, decisions will need to be made regarding the following issues of long-term importance of the Minor children (the “Significant Issues”):

....health (including all decisions relating to the medical, dental and psychological needs of the child and to the treatments arising or resulting from those needs)...

any other issues of long-term importance in the life of a child.....

Accordingly, the parties agree to discuss any decisions regarding any of the above Significant Issues prior to any decision being made.”

4. Mr. Matt has willfully violated his essential duty to discuss issues of “long-term importance” to the children as mandated by the Allocation Judgment. In particular, he displays a shocking inability to discuss issues of safety with regards to the Minor children:

a. In August of 2019, the parties son T [REDACTED] (then aged seven) told Megan that his dad and uncle wanted to take him to shoot guns if it was ok with her. Megan wrote a message in Talking Parents on August 27, 2019 raising the issue of gun safety and asking that T [REDACTED] not be allowed to use guns until aged 15 and after

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EXHIBIT T

receiving gun safety training. Mr. Matt ignored her thoughtful list of concerns about gun safety and was incapable of replying to the actual topic, stating, “I understand that you think you can make final decisions and that you have no respect for coparenting”. **(Exhibit E)**.

- b. On October 20, 2020 Megan wanted to touch base with Peter about the family’s COVID policy, stating in the Talking Parents app, “As we enter another Coronavirus surge, I’d like to have some policies we agree to as far as the boys’ behavior.... We need to inform each other about kids’ other exposures, particularly other vulnerable people...please let me know your thoughts”. Peter, incapable of replying to this important topic, wrote, “I understand that you think I break the law or I should change my parenting otherwise.” **(Exhibit F)**
- c. There is nothing of more “long-term importance to the Minor children”, as the Judgment reads, than their life, safety and health. On these occasions Mr. Matt clearly violated his obligation to discuss and collaborate on these topics as he is clearly required to do.
- d. In these and other instances Mr. Matt has shown himself to be shockingly belligerent, paranoid and incapable of rational discussion on topics of profound importance to the children’s safety and well being.

5. Paragraph 4 of the Parenting Plan provides, in no uncertain terms:

“The parties agree that the children shall be in school or appropriate childcare from 9:00a.m.to5:00p.m.”

6. On January 1, 2017 Megan tried to get Mr. Matt to tell her his child care arrangement by email. He replied, “I understand u r saying again u r the better parent. only u r

EXHIBIT T

the parent that is able to give the kids a good start into to the school week. Not sure if my parenting is ur biz. I guess something to discuss in mediation.” **(Exhibit I)**

7. On August 5, 2019 Megan asked in the Talking Parent Platform, “What’s your plan for child care next year?”, when Mr. Matt did not answer, Megan asked, “Do you work? If so, when?”. Mr. Matt replied, “I don’t see however the need for you to know about my professional life”. **(Exhibit C)**

8. In addition to violating paragraph 4 of the Parenting Plan, which requires that each party have the children in child care, Mr. Matt’s bizarre refusal to explain his child care schedule violates Megan’s rights as a mother to know how her children are cared for as Paragraph 14 of the Parenting Plan requires, stating:

“Each party shall respect the other party’s primary role as the Minor Children’s mother and father”

9. Mothers are allowed to ask who is caring for their children and what their schedule is. A competent parent would answer.

10. Mr. Matt’s goal is to have the parties’ younger son, T [REDACTED] become a professional athlete and to play in the Olympics. He wishes to schedule T [REDACTED] in sports programming for three to five hours per day to achieve this goal on his father’s behalf.

11. This has caused a continued challenge as Mr. Matt has put the boys in dangerous situations in order to schedule hours of sports every day as well as hours of therapy every day for the Parties’ other child, A [REDACTED]. Mr. Matt remains obstinately and bizarrely opposed to paying for child care and will seek to avoid it in any way.

12. On August 27, 2018, the Parties’ younger son, T [REDACTED] (then seven) informed Megan that:

EXHIBIT T

- a. His father was in the habit of routinely dropping him unattended in front of the Evanston YMCA (in order to not have to spend time parking). The Evanston YMCA is a busy facility that shares its building with a men's SRO.
 - b. Te ██████ would check himself into the Y and go to the dressing room and dress himself for a drop in swimming class. He said he was the only one alone and that the other kids had parents or babysitters.
 - c. After the swimming class Teddy would go alone to the showers in the dressing room, used by adults as well as children, and dress for a drop-in basketball class.
 - d. Megan asked if all the kids changed together, thinking perhaps it was a formal program, but Te ██████ said again that other kids had grownups picking them up and dropping them off.
 - e. In total Teddy would spend two hours at the Y without a responsible adult ensuring his safety, some of that time naked and alone in an adult dressing room.
 - f. Mr. Matt confirmed these facts and refused to change his behavior.
 - g. Megan confirmed with the Evanston YMCA that drop in classes are not child care and that per policy: Te ██████ needed to be checked in by an adult to the facility, brought to class and picked up from class by an adult.
 - h. The Evanston YMCA called Mr. Matt and wrote him a note to immediately cease this behavior. **(Exhibit D)**
13. However, rather than hiring a babysitter, Peter started taking Te ██████ to sports leaving Angus alone with therapists for hours at a time.
14. Since 20011, Angus Matt, the younger Parties' older son, has received Applied Behavioral Analysis (ABA) therapy with a variety of providers. As therapists, ABA providers are not child care providers and require a responsible adult to be with the children during sessions per their standard contract.

EXHIBIT T

a. On August 4, 2017, Peter Matt said for that, for child care, “Ar [REDACTED] could do ABA”
(Exhibit G)

b. On August 25, 2020, Megan Peter raised the issue of Peter’s inappropriate use
of ABA as child care in the Talking Parents Platform, stating:

“your plan is to spend 40-50 minutes driving T [REDACTED] to soccer then
returning, leaving Angus without childcare. You will then later spend 40-50
minutes going back to get T [REDACTED] after practice. Since you are scheduling
ABA in the home at that time, you will live Ar [REDACTED] uncared for with a male
therapist, for between an hour and twenty minutes and an hour and forty
minutes every day, depending on traffic....do you dispute these facts? Do
you have a child care plan?”

Mr. Matt replied, “I understand you want to know from me my parenting
plan” **(Exhibit K)**

15. In October of 2020 Reach ABA dropped Angus as a patient. Given his many
bizarre behaviors and continued violation of their contract, Mr. Matt’s behaviors make it difficult
for quality providers to be willing to work with Angus.

16. Mr. Matt remains in violation of the MSA.

WHEREFORE, MEGAN MATT, requests that this Court enter an Order:

A. Enforcing the Allocation Judgment paragraph 9 that Peter Matt provide childcare
for the minor children during his work day;

B. Enforcing the Allocation Judgment paragraph 1 that Peter Matt address
Significant Issues;

C. Enforcing the Allocation Judgment paragraph 14 that Peter Matt respect Megan’s
role as the children’s mother;

D. Issuing a rule, returnable *instanter*, requiring Peter to show cause why he should
not be held in indirect civil contempt for his failure to comply with the Allocation Judgment;

E. Finding Peter to be in indirect civil contempt for his failure to comply the
Allocation Judgment;

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EXHIBIT T

F. Modifying the Allocation Order as follows:

- “1. Each parent shall provide the other with a current work schedule and description of his or her childcare arrangements prior to the beginning of each school year or whenever requested by the other parent.*
- 2. Each parent is obligated to answer questions from the other parent related to the safety of the Minor children. If a parent refuses to answer or excessively delays answering such questions, he or she will be in violation of this Order.*
- 3. Each parent will provide appropriate child care at all times when they are unable to care for them because of work or other commitments”*

G. Ordering Peter to comply with the Allocation Judgment and;

H. Requiring Peter to reimburse Megan for lost wages due to the exhaustive efforts to resolve this matter, calculated as hour spent in researching, drafting and filing documents in this matter at a rate of her current annual salary (\$72,000) adjusted to an hourly rate of \$36 per hour, pursuant to Illinois Rule 137; and

I. For such further relief as this Court deems appropriate.

Respectfully submitted,



MEGAN MASON

EXHIBIT U

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, DOMESTIC RELATIONS DIVISION

IN RE THE MARRIAGE OF:)	
)	
PETER MATT,)	
)	
Petitioner,)	
)	
and)	No. 16 D 9534
)	
MEGAN MATT n/k/a MASON,)	
)	
Respondent.)	

AFFIDAVIT OF MEGAN MATT N/K/A MASON IN SUPPORT OF

I, MEGAN MATT n/k/a MASON, hereby submit this affidavit under penalties provided by law pursuant to section 1-109 of the Illinois Code of Civil Procedure and certify that the statement set forth in this affidavit are true and correct.

1. I am the Respondent in this matter.

2. I have personal knowledge of the matters stated in my PETITION FOR RULE TO SHOW CAUSE AND MOTION TO COMPEL RE: FAILURE TO SUPERVISE CHILDREN and they are true and correct except as to those matters stated on information and belief, which are believed to be true.

3. I hereby restate and incorporate by reference the allegations contained in my Petition as if the same were set forth here verbatim.

Respectfully Submitted,



MEGAN MATT n/k/a MASON

FILED DATE: 13/09/2021 0:32 PM 2016D009534

EXHIBIT V

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, DOMESTIC RELATIONS DIVISION

FILED
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IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2016D009534
Calendar, 23
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IN RE THE MARRIAGE OF:)
)
PETER MATT,)
)
Petitioner,)
)
and) No. 16 D 9534
)
MEGAN MATT n/k/a MASON,)
)
Respondent.)

IT IS ORDERED that the party herein named shall appear personally before Judge Robert Johnson via Zoom, at 9:30 am, on April 20th, 2021, to show cause why he/she should not be held in contempt of court for failing to comply with the order entered by this Court on September 27th, 2017, and states that the following is true and correct:

MEGAN MASON’S PETITION FOR RULE TO SHOW CAUSE AND MOTION TO COMPEL RE: HARASSMENT AND FAILURE TO ADHERE TO PARENTING PLAN WITH REGARD TO PARENTING TIME

MEGAN MATT n/k/a MASON, (“Megan”), pursuant to the parties’ Allocation of Parental Responsibilities Judgment and Parenting Plan (“Allocation Judgment”) entered on September 27, 2017 and all applicable rules and statutes, moves this Court to issue a Rule to Show Cause compelling PETER MATT to appear and show cause as to why he should not be held in indirect civil contempt of Court for his failure to comply with the Judgment and Marital Settlement Agreement. In support of her petition, Megan Mason states as follows:

Introduction

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EXHIBIT V

This matter requires this Court's urgent attention as Mr. Matt had demonstrated a consistent contempt and disregard for the Allocation Order entered into on September 27, 2017 Allocation Judgment, specifically as it pertains to Megan's right to parent the children during her parenting time and Mr. Matt's obligation to communicate respectfully and with appropriate boundaries presents an ongoing impediment to successful co-parenting.

Background

1. The parties were divorced on September 27, 2017. Two children were born during the marriage, namely: A [REDACTED] (age 12) and T [REDACTED] (age 9).

2. Also on September 27, 2017, the Court entered an Allocation Judgment (Parenting Plan), which incorporated the parties' Parenting Plan (**Exhibit A.**).

3. On September 25, 2019 a Parenting Coordinator, Dr. John Palen, was appointed to assist in routine decisions between the parties (**Exhibit M**)

4. The Parenting Plan The Parenting Plan paragraph 2 "Allocation of Routine and Emergency Decision Making Responsibility" reads, in no uncertain terms that: "A parent shall have sole responsibility for making routine decisions with respect to the Minor Children and for emergency decisions affecting the Minor Children's health and safety during that parent's parenting time".

5. Mr. Matt routinely and incessantly violates the specific provision that "a parent shall have *sole* responsibility for making routine decisions" during his or her parenting time and violates the very spirit of the Parenting Plan which assumes that both parents are allowed to make decisions about the children.

6. Mr. Matt is particularly obsessive and controlling Megan's time to force her to make sure that the Parties' 9-year-old son, T [REDACTED] participates in a soccer program for at least

EXHIBIT V

three hours a day, seven days a week because Mr. Matt has decided that Teddy will be in the Olympics and then a professional soccer player. When Teddy was in second grade, Mr. Matt wrote, “Ideally [Teddy] doesn’t play high school, but the US Soccer Development Academy...Before that he should make it into the Olympic Development Academy...” (**Exhibit H**).

7. Peter is obsessed with T [REDACTED]’s involvement in soccer on Sunday mornings and this has been a topic of his harassment for several years, going so far as to threaten Megan and her church community.

- a. In 2019, asked Megan to switch schedules so he could have parenting time on Sunday. Megan agreed, but then Mr. Matt changed his mind, declining to have parenting time on Sunday.
- b. Mr. Matt, however, wants to control Megan’s time on Sunday.
- c. Megan has attended Lake Street Church in Evanston with both children since two years before the parties divorced (**Exhibit F**). Lake Street Church is very important to Megan and the boys socially, personally and spiritually.
- d. Megan has told Mr. Matt that she believes while still in elementary school, the children should go to Sunday school with her during her parenting time. She believes as a mom she should expose children to the values and communities she thinks are good for them and it’s her right and duty to do so. She has stated when T [REDACTED] is thirteen she will allow him to decide whether to attend church or other social activities or sports.
- e. Mr. Matt will not accept Megan’s parenting time decisions. In order to intimidate Megan into taking T [REDACTED] to soccer on Sunday mornings, on April 29, 2019, Peter

EXHIBIT V

Matt called Lake Street Church and threatened the Lake Street Church administrator, Pat Stringer, who states:

“He introduced himself as ‘Peter Matt’....and he doesn’t like what’s going on [at Lake Street Church]. Again I asked him to elaborate. He doesn’t want his kids to come to this church. Nothing more specific than that”. **(Exhibit D)**

- f. On April 29, 2019, Mr. Matt emailed and threatened the Director of Youth Programming at Lake Street Church, Jillian Westerfield:

“Attached is the parenting agreement for A [REDACTED] and Te [REDACTED]. Let me know if they show up at your church again please. I will call the police and have them removed I offered her multiple times family therapy, mediation, and a guardian ad litem for the kids and the outstanding issues. She refuses all that”. **(Exhibit E)**

- g. On April 29, 2019, Mr. Matt again threatened Megan, “If you bring them [to church] again I will call the police” Via email **(Exhibit D)**
- h. The Lake Street Church youth director, Jillian Westerfield, was concerned about violence to the church community and to Megan and her children and referred Megan to a Lake Street congregant and attorney who specializes in violence against women, Kaethe Morris Hoffer, Executive Director of the Chicago Alliance Against Sexual Exploitation. **(Exhibit G)**
- i. Megan had a phone consultation with Kaethe Morris Hoffer on May 9, 2019 in which she described Mr. Matt’s pattern of behavior to Ms. Hoffer. Ms. Hoffer told Megan that vexatious litigation, financial abuse and harassment are forms of domestic abuse and referred Megan to a domestic violence advocacy group in the hope of accessing subsidized legal help. **(Exhibit G)**
- j. On at least three occasions Mr. Matt has filed spurious motions to this Court alleging that Megan has violated the Parenting Plan’s provision that the parents “maintain the faith” of the children. This is not only deceitful, as Megan has been

EXHIBIT V

taking the children to Lake Street church since two years before their divorce, but it is a blatant attempt to control Megan's time for Mr. Matt's selfish interests.

- k. Mr. Matt continues to attempt to force Megan to schedule activities on Sunday mornings.
 - l. Sunday mornings are still Megan's parenting time per mutual agreement.
 - m. Mr. Matt bullies and harasses Megan to try to force her to do Sunday swimming for the parties' other child, A [REDACTED] during her parenting time.. **(Exhibit I, Exhibit P)**.
 - n. On November 5, 2020, Megan reached out the PC, Dr. Palen, to ask him to help stop Mr. Matt from harassing about Sundays. **(Exhibit I)**.
 - o. Instead of ceasing his harassment, Mr. Matt responded to the email, "I think A [REDACTED] Special Olympics is more important and fun for him" and " if there is soccer, that is more important than church" **(Exhibit I)**.
8. Mr. Matt shows a shocking lack of awareness that Megan is entitled to make decisions, suggesting that because he has an opinion about her parenting time, she must obey. This defies the basic premise of co-parenting.
9. Mr. Matt also attempts to force Megan to schedule activities on every other day of her parenting time and will not accept no for an answer.
10. Every other Saturday evening, the boys are with Megan per mutual agreement. Mr. Matt regularly harasses Megan to control her Saturday schedule, going so far as to kidnap the children.
- a. In 2019 Mr. Matt asked Megan if he could enroll T [REDACTED] in a third soccer program that played on Saturday evenings, "The Quad". Megan considered the program

EXHIBIT V

but ultimately said no, preferring to keep the parenting time she shares with the boys every other Saturday for family time such as visiting friends or going to cultural activities.

- b. Mr. Matt nonetheless enrolled T[REDACTED] in the Saturday soccer program and badgered Megan repeatedly to attend this program every other week.
- c. On January 3, 2020 he again asked to take T[REDACTED] to the Quad and Megan repeated that she did not support this program during her parenting time. **(Exhibit L)**
- d. Mr. Matt continued to harass Megan about the Quad and also raised the issue of the Quad to T[REDACTED] violating basic parenting common sense and the specific clause in the Parenting Plan that, “the parties shall not initiate discussions about disputed issues between the parties or make extensive inquiries into the activities of the other party with the Minor Children” **(Exhibit O, Exhibit A)**
- e. Mr. Matt continued to not only ask to take T[REDACTED] to the Quad but escalated and kidnapped the children in order to take T[REDACTED] to the Quad on Saturday, July 20, 2019. **(Exhibit Q)**
- f. Per mutual parental agreement, the boys were to be in Megan’s care alternating Saturdays at 3pm. This parenting time plan has been in place for several years by mutual agreement.
- g. On Saturday, July 20, 2019, Megan went to Peter’s home to pick up the children to take them to an art festival she and the boys planned to attend her parenting time. Mr. Matt had T[REDACTED] at the Quad and refused to relinquish the children.

EXHIBIT V

- h. Mr. Matt showed the texts from Megan, in which she admonished him for kidnapping and indicated she would call the police in the future, to the minor children T [REDACTED] and A [REDACTED]
11. Mr. Matt also continues to attempt to force Megan to schedule activities on Mondays and Tuesdays and ignores the PC decisions in the matter. **(Exhibits B, M, O).**
12. Mr. Matt is unable to respond in an emotionally appropriate manner to Megan having parenting rights and occasionally having opinions with which he disagrees.
- a. Multiple times a week, Mr. Matt emails, texts or messages Megan and/or other Parties involved in children's care - therapists, GAL, PC - to "discuss" scheduling something during Megan's parenting time.
 - b. Mr. Matt calls this harassment collaboration. Mr. Matt believes he is entitled to control all hours of Megan's parenting time if he calls this control collaboration, co-parenting or frames it as in the children's interest.
 - c. Mr. Matt believes only his opinions matter when it comes to the interest of the children, so any discussion of "children's interest" by Mr. Matt is really a discussion of how to do what he wants and how to force others to do what he wants.
13. When the Parties do agree to activities across parenting time, Mr. Matt is controlling and inappropriate in his monitoring of Megan's activity.
- a. Megan had agreed for a season to take T [REDACTED] to soccer practice in Chicago on Mondays in the Fall season of 2020.
 - b. One day Megan decided to keep T [REDACTED] home to decorate the Christmas tree and emailed the coach in advance to inform him of T [REDACTED]'s absence. **(Exhibit K)**

EXHIBIT V

- c. Having learned that T █████ missed a practice Mr Matt became enraged and used this as a basis to ask the PC to revoke Megan's parenting rights. He wrote, "John. It seems Megan didn't go again this Monday. T █████ said that mom said it was too muddy, but she knew that practice was happening. Can you make a decision please?". By "make a decision", Mr. Matt was referring to his ongoing campaign to get John to revoke Megan's right to make parental decisions **(Exhibit J)**.
- d. When Megan clarified that this was a minor scheduling change, cleared with the coach, Mr. Matt asked her to copy him on all her communications to the coach, demonstrating his profound lack of awareness when it comes to infringing on others' rights and boundaries. **(Exhibit K)**
14. In his pattern of abuse, harassment and intimidation, Mr Matt has gone so far as to involve the parties' young children in their disputes, in violation of the Parenting Plan regarding disparaging other parent in direct violation of the Parenting Plan.
- a. On November 23rd, 2020, Mr. Matt let T █████, then eight, attend a Zoom meeting with the Parenting Coordinator and/or GAL, without informing the other parties.
- b. As T █████ was not in front of the camera, only Peter knew that T █████ was in attendance.
- c. This meeting was planned around a number of high conflict topics and inappropriate for a young child.
- d. When Megan asked Mr. Matt why T █████ was there, Mr. Matt replied, "What am I supposed to do, ask him to leave?", suggesting Mr. Matt is perhaps incapable of enforcing the type of boundaries important for a child.

EXHIBIT V

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- e. Mr. Matt also lets the children read texts and emails and Talking Parents messages between himself and Megan and refuses to stop doing so. He seems particularly focused on showing them any communication that is contentious as a means of disparaging Megan to the children.

15. As part of his efforts to punish and control Megan, Mr. Matt also slanders Megan to neighbors, family and other acquaintances by falsely stating that Megan has embezzled money. His attorney has also stated that Megan embezzled money.

- a. At no point has Megan stolen or embezzled money.

16. As part of his efforts to punish and control Megan, Mr. Matt also slanders Megan to neighbors, family and other acquaintances by falsely stating that Megan has a diagnosed personality disorder.

- a. Megan takes mental health issues seriously, particularly as they may relate to the safety of the children, and has consistently expressed an openness to getting mental health assessments and support should that be necessary. Mr. Matt has provided no specific concern or interest in an evaluation.
- b. Megan has asked Mr. Matt and his counsel to support a Section 604B Evaluation that includes a psychological evaluation of both parents, including herself, but Mr. Matt refuses.
- c. Mr. Matt continues to claim to mutually acquaintances and family members that Megan has a severe personality disorder.

17. Mr. Matt remains in violation of the MSA.

EXHIBIT V

18. Mr. Matt's inability to respect boundaries, his unrelenting harassment, and his cruel attacks on Megan demand serious consideration as they are part of a pattern of abuse that may escalate to harm Megan and the minor children.

WHEREFORE, MEGAN MATT, requests that this Court enter an Order:

- A. Enforcing the Allocation Judgment
- B. Issuing a rule, returnable *instanter*, requiring Peter to show cause why he should not be held in indirect civil contempt for his failure to comply with the Allocation Judgment;
- C. Finding Peter to be in indirect civil contempt for his failure to comply the Allocation Judgment;
- D. Ordering Peter to comply with the Allocation Judgment and;
- E. Modifying the Allocation Order as follows:

“1. Each parent shall respect the other parent's right to disagree on occasion. Neither parent is allowed to harass the other. If either parent raises an issue more than five times after the other parent has made a decision with which he or she disagrees, the parent raising the issue more than five times shall be considered harassing the other parent and in violation of this Order. This Court may impose financial penalties on a party found to be harassing the other.

2. “Neither parent shall show emails, texts or Talking Parents messages from the other parent to the children. Both parents will make a reasonable effort to stop the children from reading communications from one parent to the other or being involved in disputes, including putin a password lock on their phones. Neither parent shall allow the children to attend virtual or in-person court or

EXHIBIT V

meetings with the parties attorneys, meetings with the GAL or meetings with the Parenting Coordinator unless all parties are aware and give consent. This Court may impose financial penalties if either parent is found to be willfully exposing the Minor children to parental conflict, negotiations or discussions about parenting decisions“

F. Modifying the order appointing a parenting coordinator to read:

“The parties shall meet with the Parenting Coordinator on a monthly basis to discuss parenting decisions. Between meetings, the parties shall make every effort to refrain from involving the Parenting Coordinator in any discussions, including calling for meetings or copying the Parenting Coordinator on emails, except in genuinely time sensitive, urgent issues related to the health and safety of the children. Under no circumstances may one Parent ask the Parenting Coordinator to tell the other parent what to do during that Parent’s Parenting Time.”

G. Ordering Mr. Matt to never schedule an activity during Megan’s time.

H. Ordering Mr. Matt not to allege that Megan has engaged in theft or embezzlement;

I. Ordering Mr. Matt to not allege that Megan has a diagnosed personality disorder;

J. Ordering Mr. Matt to engage a parenting coach or therapist recommended by Dr. John Palen within 30 days;

K. Ordering Mr. Matt to to meet with the parenting coach or therapist recommended by Dr. John Palen on, at minimum, a monthly basis for a period of no less than six months, with a goal to: improve Mr. Matt’s understanding of appropriate parenting

EXHIBIT V

responsibilities, improve Mr. Matt's understanding of basic child safety and supervision; improve Mr Matt's ability to communicate in a non-threatening manner and to improve Mr. Matt's ability to acknowledge and respect personal boundaries;

L. Requiring Peter to reimburse Megan for all payments to Dr. John Palen in the role of Parenting Coordinator, to date;

M. Requiring Peter to reimburse Megan for lost wages do to the exhaustive efforts to resolve this matter, calculated as hour spent in researching, drafting and filing documents in this matter at a rate of her current annual salary (\$72,000) adjusted to an hourly rate of \$36 per hour, pursuant to Illinois Rule 137; and

N. For such further relief as this Court deems appropriate.

Respectfully submitted,



MEGAN MASON

EXHIBIT W

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, DOMESTIC RELATIONS DIVISION**

FILED
11/30/2021 9:32 AM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2016D009534

Associate Judge Robert W. Johnson
Calendar 23
15765459

IN RE: THE MARRIAGE OF)
PETER MATT,)
Petitioner,)
and)
MEGAN MATT,)
Respondent.)

Case No. 2016 D 9534

AUG 21 2020
Circuit Court-2156

ORDER

This cause coming before the Court for a hearing on Peter Matt's two count Petition for Rule to Show Cause, both parties appearing remotely with their counsel and the Guardian Ad Litem appearing, and the Court holding an evidentiary hearing and otherwise being advised,

IT IS ORDERED:

1. Peter Matt's Petition for Rule to Show Cause, Count I, is granted in part and denied in part. The Court finds that Megan Matt willfully and contumaciously failed to participate in the court ordered ABA therapy for A [REDACTED] in violation of the Allocation Judgment and the obligation to co-parent on Significant Decisions, and therefore is found to be in indirect civil contempt of court following the issuance of a Rule and her failure to provide a legally sufficient reason for failure to comply with the Allocation Judgment, but she did not violate the Allocation Judgment as it alleged as to soccer, religion, and a new psychiatrist.
2. Peter Matt's Petition for Rule to Show Cause, Count II, is granted. The Court finds that Megan Matt willfully and contumaciously failed to participate in the court ordered ABA therapy for A [REDACTED] in violation of the November 20, 2019 Court Order, and therefore is found to be in indirect civil contempt of court following the issuance

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EXHIBIT W

of a Rule and her failure to provide a legally sufficient reason for failure to comply with the November 20, 2019 Court Order.

3. The purge shall be determined by the Court at the next Court date.
4. Peter Matt has leave to file a motion for Section 508(b) attorney's fees.
5. This matter is set for status on all pending issues and GAL report on August 28, 2020 at 8:30 a.m.

ENTERED:


JUDGE

#29558
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Attorneys for Peter Matt

EXHIBIT X

FILED
11/30/2021 9:32 AM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2016D009534
Calendar, 23
15765159

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, DOMESTIC RELATIONS DIVISION

IN RE THE MARRIAGE OF:)
)
PETER MATT,)
)
Petitioner,)
)
and) No. 16 D 9534
)
MEGAN MATT n/k/a MASON,)
)
Respondent.)

**MOTION TO VACATE DECEMBER 3, 2018 RULE TO SHOW CAUSE AND FOR
SANCTIONS**

Respondent, MEGAN MATT n/k/a MASON (“Megan”), by her attorneys, Berger Schatz, and pursuant to 735 ILCS 5/2-1203 moves this Court to vacate and deem null and void the December 3, 2018 Rule to Show Cause Order. Megan also moves this Court for sanctions against Petitioner, PETER MATT (“Peter”) due to the fact that Megan did not receive notice of Peter’s underlying Petition for Rule to Show Cause until after the issuance of the December 3, 2018 Rule to Show Cause order. In support thereof, Megan states as follows:

1. On September 27, 2017, the Court entered a Judgment of Dissolution of Marriage (“Judgment”), incorporating a Marital Settlement Agreement (“MSA”).
2. On November 19, 2018, Peter filed a Petition for Rule to Show Cause and Motion to Compel (“Petition”) against Megan, alleging that she failed to contribute to the children’s health insurance premiums and the children’s medical expenses.¹
3. Megan received no notice of the Petition or a court date and on December 3, 2018, without Megan’s knowledge or presence, Peter appeared before the Court to present his

¹ Peter’s Petition is wholly without merit, and Megan is filing a separate Motion to Dismiss.

EXHIBIT X

Petition, and the Court issued a Rule to Show Cause Order against Megan. A copy of the December 3, 2018 Rule to Show Cause is attached as **Exhibit A**.

4. Indeed, Megan was not served with Peter's Petition until *after* the Court issued a Rule to Show Cause Order against her. Specifically, the events leading up to the December 3, 2018 court date are as follows:

- a. On November 19, 2018, Peter filed his Petition and Notice of Motion ("Notice") with a certificate of service claiming, under penalty of perjury, that all documents had been served on November 19, 2018 to all parties. A copy of the Petition and Notice of Motion are attached as **Exhibit B**.
- b. The Notice and the Petition were sent only by way of regular mail. However, despite the Notice claiming the documents were served on November 19, 2018, the envelope containing the documents clearly shows postage dated November 21, 2018 (two days after claimed service was made and the day before Thanksgiving). A copy of the envelope is attached as **Exhibit C**.
- c. Megan and her counsel are obviously not privy to the representations Peter made to the Court on December 3, 2018 regarding Megan's service; however, presumably the Court inquired about whether Megan was properly served, or whether there had been attempts to reach Megan the morning of the court date before issuing the rule. However, by the morning of December 3, 2018, Megan had not received a copy of the Notice or the Petition from Peter or his counsel and no attempts were made to contact Megan and ask whether she intended to be in court.

EXHIBIT X

- d. After the Rule was issued on December 3, 2018, Peter's counsel decided to not only serve the Rule via regular mail, but also by e-mail. It is important to note that Peter and his counsel chose not to serve or send the Petition or Notice to Megan via e-mail at any time. When Megan received the Rule by e-mail, she became aware *for the first time* that Peter had not only instigated proceedings against her, but that the Court had already entered an order on the matter.
- e. Later that day, after receiving the Rule via e-mail, Megan finally received the Petition and Notice in the mail.

5. Illinois caselaw firmly establishes that an order is void when a party does not receive proper notice. *See Moore v. One Stop Medical Center*, 218 Ill. App. 3d 1011, 1016 (1st Dist. 1991) (holding, judgment was void because party did not receive notice and was denied constitutional rights to due process). *See also In re Gustafson*, 268 Ill. App. 3d 404, 409 (2nd Dist. 1994) (finding order to be null and void as a denial of due process where entered ex parte and without proper notice, and stating, “[t]he parties have a right to be heard when their rights are affected, and in order to enjoy that right they must first be notified. At a minimum, procedural due process requires notice, an opportunity to respond, and a meaningful opportunity to be heard.”)

6. On December 7, 2018, Megan's counsel reached out to Peter's counsel indicating these defects and asked that the Rule issued be vacated immediately. A copy of the December 7, 2018 correspondence is attached as **Exhibit D**. Peter's counsel refused.

7. Because Megan did not receive notice of the Petition, Megan requests that this Court vacate the December 3, 2018 Rule to Show Cause Order.

EXHIBIT X

8. Even if Megan had received the Notice and Petition prior to the court date, it is not clear when the Petition was set for presentment (the date and time portion of the Notice is blank). See **Exhibit B**. Moreover, the Notice also indicates two different courtrooms. Clearly, the Notice is deficient and cannot be deemed proper. Therefore, the Rule issued on December 3, 2018 must be vacated.

9. By (i) not giving Megan notice of the November 19, 2018 Petition and the December 3, 2018 court date, and (ii) filing a false certificate of service when Megan had *not* been served, Peter violated several local and Illinois Supreme Court Rules and statutes, including, but not limited to Illinois Supreme Court Rule 104, 735 ILCS 5/1-109, and Rule 1.1 of the Circuit Court of Cook County.

10. Pursuant to Illinois Supreme Court Rule 137, the Court should issue sanctions against Peter for his violation of the aforementioned rules. Finally, Peter should be further sanctioned under Rule 137 in the event that, upon presenting his Petition and obtaining the Rule to Show Cause against Megan, he either misrepresented or omitted the fact that Megan had not received notice of his Petition.

WHEREFORE, Respondent, Megan Matt n/k/a Mason, respectfully requests that this Court:

- A. Vacate and deem null and void the December 3, 2018 Rule to Show Cause Order entered against Megan Matt n/k/a Mason;
- B. Impose sanctions against Peter Matt pursuant to Illinois Supreme Court Rule 137, to include ordering him to pay the attorneys' fees and costs incurred by Megan for the preparation and presentation of this Motion to Vacate; and

EXHIBIT X

C. Grant such other relief as this Court deems just and equitable.

Respectfully Submitted,

By: _____
Berger Schatz – One of her attorneys

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EXHIBIT X

VERIFICATION BY CERTIFICATION

Under penalties as provided by law pursuant to 735 ILCS 5/1-109, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that she believes the same to be true.

Megan Mason