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IRIS Y. MARTINEZ
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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, DOMESTIC RELATIONS DIVISION

IN RE THE MARRIAGE OF:)
PETER MATT,)
 Petitioner,)
) No. 2016 D 9534
And)
)
MEGAN MATT,)
 Respondent.)

**PETER MATT’S RESPONSE TO MOTION TO DISMISS PRTSC RECEIVED BY
PETER MATT ON FEBRUARY 28th, 2022**

NOW COMES, the Petitioner, PETER MATT, individually and by and through his attorneys, KATZ, GOLDSTEIN & WARREN, and in response to MEGAN MATT’s (k/n/a Mason), Motion to Dismiss PRTSC Received by Peter Matt on February 28th, 2022, states as follows:

1. PETER MATT states that the statute cited in Paragraph 1 speaks for itself and denies attempts to paraphrase same, and further states that the Statute is inapplicable here.
2. PETER MATT denies the allegations contained in Paragraph 2.
3. PETER MATT denies the allegations contained in Paragraph 3, including subparagraphs (a) – (f). PETER MATT further states that MEGAN MATT unilaterally terminated Angus’ ABA Therapy because the therapist was unvaccinated and all attempts to find a new therapist are due to her violations of the Court Order and Parenting Plan.
4. PETER MATT denies the allegations contained in Paragraph 4.
5. PETER MATT denies the allegations contained in Paragraph 5, and further states as to the subparagraphs as follows:

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the allegations contained in Paragraphs 58(a), (b), (e), and (g) but has insufficient information to be able to admit or deny the allegations contained in Paragraphs (c), (d), (i) and (j) therefore denies same, and denies the remaining allegations contained in Paragraph 58(f) and (h).

59. PETER MATT states that no allegations of fact are alleged in Paragraph 59 and therefore no response is necessary.

60. PETER MATT denies the allegations contained in Paragraph 60.

WHEREFORE, the Petitioner, PETER MATT, individually and by and through his attorneys, KATZ, GOLDSTEIN & WARREN, respectfully prays as follows:

- A. That this Honorable Court deny MEGAN MATT's Petition to Transfer Venue;
- B. To assets attorneys' fees in favor of PETER MATT and against MEGAN MATT for responding to said petition; and,
- C. For such further relief this Court deems necessary and just.

Respectfully submitted,



PETER MATT

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#35921

ATTORNEY'S STATEMENT

I, the undersigned, state that I am one of the attorneys employed by the firm of KATZ, GOLDSTEIN & WARREN and representing the party who has signed the foregoing pleading. I certify that I have read the foregoing pleading and that to the best of my knowledge, information and belief, formed after reasonable inquiry of my client, said pleading is well grounded in fact and is warranted by existing law or a good faith argument for the extension, modification or reversal of existing law, and that said pleading is not interposed for any improper purpose, such as to harass or to cause unnecessary delay or needless increase in the cost of litigation.

KATZ, GOLDSTEIN & WARREN

By: Christopher D. Wehrman
One of the attorneys for PETER MATT

CLIENT'S VERIFICATION

UPON PENALTY OF PERJURY, I, the undersigned, state that I have read the foregoing pleading. I further state that this pleading is being filed with my consent and as part of my attorney's required duties in representing me. I further state that my attorney has explained to me that by signing this pleading and this verification, I am acknowledging that my attorney is acting with my consent and at my direction and that my attorney has based his statement on the factual information provided to him by me, as well as upon his investigation thereof.



PETER MATT

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