

4. PETER MATT denies the allegations contained in Paragraph 4.
5. PETER MATT states that the statute cited in Paragraph 5 speaks for itself and denies attempts to paraphrase same, and further states that the statute cited is inapplicable herein.
6. PETER MATT denies the allegations contained in Paragraph 6.
7. PETER MATT states that no allegations of fact are alleged in Paragraph 7 and therefore no response is necessary.
8. PETER MATT states that no allegations of fact are alleged in Paragraph 8 and therefore no response is necessary.
9. PETER MATT denies the allegations contained in Paragraph 9.
10. PETER MATT admits the allegations contained in Paragraph 10.
11. PETER MATT admits the allegations contained in Paragraph 11.
12. PETER MATT admits that the parties have been engaged in post-decree litigation, but denies the remaining allegations contained in Paragraph 12.
13. PETER MATT denies the allegations contained in Paragraph 13.
14. PETER MATT admits that he has sought court intervention, but states that court intervention was necessary for the enforcement of this Court's orders, and denies the remaining allegations contained in Paragraph 14.
15. PETER MATT admits that multiple individuals were appointed by the Court and further answers the subparts of Paragraph 15 as follows:
 - a. PETER MATT admits the allegations contained in Paragraph 15(a), and further states that the motion to appoint the GAL was granted after briefing and a scheduled hearing;
 - b. PETER MATT admits that Dr. Palen was appointed as a Parenting Coordinator by the Court at the behest of the attorneys and GAL to reduce conflict in this matter. PETER MATT has insufficient knowledge as to whether MEGAN MATT was informed or asked about the appointment of a

- parenting coordinator as she was represented by counsel at the time;
- c. PETER MATT admits that Dr. Blechman was appointed as a 604.10(b) evaluator, that the exhibits contained in Paragraph 15(c) speak for themselves, and affirmatively states that Dr. Blechman was appointed in part due to MEGAN MATT's allegations of abuse by PETER MATT.
16. PETER MATT denies the allegations contained in Paragraph 16.
 17. PETER MATT denies the allegations contained in Paragraph 17, and further answers the subparagraphs of Paragraph 17 as follows:
 - a. PETER MATT denies the allegations contained in Paragraph 17(a);
 - b. PETER MATT denies any allegations of domestic violence, and has insufficient knowledge of the remaining allegations contained in Paragraph 17(a) to be able to admit or deny the allegations contained therein, and therefore denies same.
 - c. PETER MATT admits he contacted Ms. Westerfield, but denies the allegations contained in Paragraph 17(c);
 - d. PETER MATT has insufficient knowledge to be able to admit or deny the allegations contained in Paragraph 17(d), and therefore denies same;
 - e. PETER MATT has insufficient knowledge to be able to admit or deny the allegations contained in Paragraph 17(e), and therefore denies same;
 - f. PETER MATT admits that the parties were divorced at the time of the appointment of the GAL, has insufficient knowledge to be able to admit or deny the beliefs of MEGAN MATT, and denies the remaining allegations contained in Paragraph 17(f);
 - g. PETER MATT has insufficient knowledge to be able to admit or deny the allegations contained in Paragraph 17(g), and therefore denies same;
 - h. PETER MATT has insufficient knowledge to be able to admit or deny the allegations contained in Paragraph 17(h), and therefore denies same;
 - i. PETER MATT has insufficient knowledge to be able to admit or deny the allegations contained in Paragraph 17(i), and therefore denies same;
 - j. PETER MATT has insufficient knowledge to be able to admit or deny the allegations contained in Paragraph 17(j), and therefore denies same;
 - k. PETER MATT admits that he caused a petition for rule to show cause to be filed on March 10, 2020, that it was set for presentment on March 20, 2020, and that counsel for MEGAN MATT received notice. PETER MATT has insufficient knowledge to be able to admit or deny the remaining allegations contained in Paragraph 17(k), and therefore denies same;
 - l. PETER MATT has insufficient knowledge to be able to admit or deny the allegations contained in Paragraph 17(l), and therefore denies same;
 - m. PETER MATT has insufficient knowledge to be able to admit or deny the allegations contained in Paragraph 17(m), subparagraphs (i)-(vii), and therefore denies same;
 - n. PETER MATT has insufficient knowledge to be able to admit or deny the allegations contained in Paragraph 17(n), and therefore denies same;
 - o. PETER MATT has insufficient knowledge to be able to admit or deny the allegations contained in Paragraph 17(o), and therefore denies same;
 - p. PETER MATT admits that evidence was presented at the evidentiary hearing on the petition for rule to show cause, but denies the remaining allegations

- contained in Paragraph 17(p);
- q. PETER MATT denies the allegations contained in Paragraph 17(q);
 - r. PETER MATT states that the Court Order referenced in Paragraph 17(r) as to ABA Therapy speaks for itself and denies attempts to paraphrase same;
 - s. PETER MATT has insufficient knowledge to be able to admit or deny the allegations contained in Paragraph 17(s), and therefore denies same, and further states that the issue was not in-home ABA Therapy;
 - t. PETER MATT admits that after an evidentiary hearing, which included MEGAN MATT's testimony, MEGAN MATT was found in contempt of court, but denies the remaining allegations contained in Paragraph 17(t);
 - u. PETER MATT has insufficient knowledge to be able to admit or deny the allegations contained in Paragraph 17(u), and therefore denies same;
 - v. PETER MATT admits that a motion to reconsider was not filed, and states that he has insufficient knowledge to be able to admit or deny the allegations contained in Paragraph 17(v), and therefore denies same;
 - w. PETER MATT admits that Brad Trowbridge was on the list of approved child representatives, and has insufficient knowledge to be able to admit or deny the remaining allegations contained in Paragraph 17(w), and therefore denies same.
18. PETER MATT has insufficient knowledge to be able to admit or deny MEGAN MATT's purported fears and therefore denies same, but denies the remaining allegations contained in Paragraph 18.
19. PETER MATT admits that Mr. Bender was appointed on June 6, 2019 and that there were by the parties to consider, has insufficient knowledge as to Mr. Bender reviewing emails or the dates of communication with teachers and therapists, and denies the remaining allegations contained in Paragraph 19.
20. PETER MATT denies the allegations contained in Paragraph 20, and further states that the court orders scheduling the matters for status and/or hearing were provided to counsel for MEGAN MATT and that the appearances before the Court were scheduled court appearances.
21. PETER MATT admits that Mr. Bender was serving as an advocate for the children pursuant to the statutory authority appointing him as a GAL, but denies the remaining allegations contained in Paragraph 21.

22. PETER MATT has insufficient knowledge to be able to admit or deny MEGAN MATT's purported impressions and therefore denies same, but denies the remaining allegations contained in Paragraph 22.
23. PETER MATT denies the allegations contained in Paragraph 23.
24. PETER MATT admits Paragraph 24(a), but denies the remaining allegations contained in Paragraph 24, including subparagraphs (b)-(f).
25. PETER MATT denies the allegations contained in Paragraph 25, including subparagraphs (a)-(i).
26. PETER MATT has insufficient knowledge to be able to admit or deny MEGAN MATT's purported fears and therefore denies same, but denies the remaining allegations contained in Paragraph 26, including subparagraphs (a)-(d).
27. PETER MATT denies the allegations contained in Paragraph 27.
28. PETER MATT admits Paragraph 28(g), has insufficient information to be able to admit or deny the allegations contained in Paragraph 28(n), states that the court order identified in Paragraph 28(h) speaks for itself and denies attempts to paraphrase same, and denies the remaining allegations contained in Paragraph 28, including subparagraphs (a)-(m).
29. PETER MATT admits that MEGAN MATT holds a Masters Degree in Education, but denies the remaining allegations contained in Paragraph 29, and further answers the subparagraphs of Paragraph 29 as follows:
 - a. PETER MATT denies the allegations contained in Paragraph 29(a);
 - b. PETER MATT denies the allegations contained in Paragraph 29(b);
 - c. PETER MATT denies the allegations contained in Paragraph 29(c);
 - d. PETER MATT denies the allegations contained in Paragraph 29(d);
 - e. PETER MATT denies the allegations contained in Paragraph 29(e);
 - f. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 29(f) and therefore denies same;

- g. PETER MATT admits the allegations contained in Paragraph 29(g);
 - h. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 29(h) and therefore denies same;
 - i. PETER MATT denies the allegations contained in Paragraph 29(i);
 - j. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 29(j) and therefore denies same;
 - k. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 29(k) and therefore denies same;
 - l. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 29(l) and therefore denies same;
 - m. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 29(m) and therefore denies same;
 - n. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 29(n) and therefore denies same;
 - o. PETER MATT admits that he transported Theodore to Dr. Brunner's office, but denies the remaining allegations contained in Paragraph 29(o);
 - p. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 29(p) and therefore denies same;
 - q. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 29(q) and therefore denies same;
 - r. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 29(r) and therefore denies same;
 - s. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 29(s) and therefore denies same;
 - t. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 29(t) and therefore denies same;
 - u. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 29(u) and therefore denies same;
 - v. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 29(v) and therefore denies same;
 - w. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 29(w) and therefore denies same;
 - x. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 29(x) and therefore denies same;
 - y. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 29(y) and therefore denies same;
 - z. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 29(z) and therefore denies same;
 - aa. PETER MATT denies the allegations contained in Paragraph 29(aa).
30. PETER MATT denies any allegations of domestic violence, and has insufficient knowledge of the remaining allegations contained in Paragraph 17(a) to be able to admit or deny the allegations contained therein, and therefore denies same.
31. PETER MATT admits there was a court appearance on August 25, 2021 and that the GAL provided a report to the Court, but denies the remaining allegations contained in Paragraph 31 as an accurate representation of the report by the GAL.

32. PETER MATT admits the allegations contained in Paragraph 32.
33. PETER MATT denies the allegations contained in Paragraph 33, further stating that MEGAN MATT's allegations were, in part, a basis for the Court to appoint a Section 604.10(b) evaluator.
34. PETER MATT denies the allegations contained in Paragraph 34.
35. PETER MATT denies the allegations contained in Paragraph 35.
36. PETER MATT denies the allegations contained in Paragraph 36.
37. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 37 and therefore denies same.
38. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 38 and therefore denies same.
39. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 39 and therefore denies same.
40. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 40 and therefore denies same.
41. PETER MATT states that no allegations of fact are alleged in Paragraph 41 and therefore no response is necessary.
42. PETER MATT denies the allegations contained in Paragraph 42.
43. PETER MATT denies the allegations contained in Paragraph 43 and further states as to the subparagraphs:
 - a. PETER MATT admits the allegations contained in Paragraph 43(a);
 - b. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 43(b) and therefore denies same;
 - c. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 43(c) and therefore denies same.
44. PETER MATT denies the allegations contained in Paragraph 44, and further

answers the subparagraphs of Paragraph 44 as follows:

- a. PETER MATT denies the allegations contained in Paragraph 44(a);
- b. PETER MATT denies the allegations contained in Paragraph 44(b);
- c. PETER MATT denies the allegations contained in Paragraph 44(c);
- d. PETER MATT denies the allegations contained in Paragraph 44(d);
- e. PETER MATT admits the allegations contained in Paragraph 44(e);
- f. PETER MATT denies the allegations contained in Paragraph 44(f);
- g. PETER MATT denies the allegations contained in Paragraph 44(g);
- h. PETER MATT denies the allegations contained in Paragraph 44(h);
- i. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 44(i) and therefore denies same;
- j. PETER MATT admits that MEGAN MATT was provided opportunity and time to provide her arguments on her motion to substitution of judge for cause, as did all counsel of record, and that did not prepare a written response to the motion, and denies the remaining allegations contained in Paragraph 44(j);
- k. PETER MATT denies the allegations contained in Paragraph 44(k);
- l. PETER MATT admits the allegations contained in Paragraph 44(l);
- m. PETER MATT denies the allegations contained in Paragraph 44(m);
- n. PETER MATT states that no allegations of fact are alleged in Paragraph 44(n) and therefore no response is necessary;
- o. PETER MATT states that no allegations of fact are alleged in Paragraph 44(o) and therefore no response is necessary;
- p. PETER MATT denies the allegations contained in Paragraph 44(p);
- q. PETER MATT denies the allegations contained in Paragraph 44(q).

45. PETER MATT denies the allegations contained in Paragraph 45.

46. PETER MATT denies the allegations contained in Paragraph 46.

47. PETER MATT admits that MEGAN MATT was provided opportunity and time to provide her arguments on her motion to substitution of judge for cause, as did all counsel of record, and that did not prepare a written response to the motion, and denies the remaining allegations contained in Paragraph 47;

48. PETER MATT denies the allegations contained in Paragraph 48.

49. PETER MATT denies the allegations contained in Paragraph 49, including subparagraphs of Paragraph 49 as follows:

- a. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 49(a) and therefore denies same;
- b. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 49(b) and therefore denies same;
- c. PETER MATT has insufficient information to be able to admit or deny the

- allegations contained in Paragraph 49(c) and therefore denies same;
- d. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 49(d) and therefore denies same;
- e. PETER MATT states that no allegations of fact are alleged in Paragraph 49(e) and therefore no response is necessary;
- f. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 49(f) and therefore denies same;
- g. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 49(g) and therefore denies same;
- h. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 49(h) and therefore denies same;
- i. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 49(i) and therefore denies same;
- j. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 49(j) and therefore denies same;
- k. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 49(k) and therefore denies same.

- 50. PETER MATT states that no allegations of fact are alleged in Paragraph 50 and therefore no response is necessary.
- 51. PETER MATT states that no allegations of fact are alleged in Paragraph 51 and therefore no response is necessary.
- 52. PETER MATT denies the allegations contained in Paragraph 52.
- 53. PETER MATT states that no allegations of fact are alleged in Paragraph 53 and therefore no response is necessary.
- 54. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 54 and therefore denies same.
- 55. PETER MATT denies the allegations contained in Paragraph 55.
- 56. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 56 and therefore denies same.
- 57. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 57 and therefore denies same.
- 58. PETER MATT admits the allegations contained in Paragraph 58, but denies

the allegations contained in Paragraphs 58(a), (b), (c), 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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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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