





- Personal hand delivery to:
  - The party
  - The party's family member who is 13 or older, at the party's residence
  - The party's lawyer
  - The party's lawyer's office
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c. On: 07/03/2022 at: 10:15  a.m.  p.m.  
Date Time

In c, fill in the date and time that you are sending the document.

In 2, if you are sending the document to more than 1 party or lawyer, fill in a, b, and c. Otherwise leave 2 blank.

**2. I am sending the Answer/Response to Complaint/Petition**

a. To:  
 Name: Steve Klein  
First Middle Last  
 Address: KGW 2345 Waukegan Rd Suite 150Bannockburn, IL 60015  
Street, Apt # City State ZIP  
 Email sklein@kglaw.com

In 2a, enter the name, mailing address, and email address of the party you are sending the document to. If they have a lawyer, you **must** enter the lawyer's information.

- b. By:
- An approved electronic filing service provider (EFSP)
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Only use one of the methods below if you do not have an email address, or the person you are sending the document to does not have an email address.
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    - The party's family member who is 13 or older, at the party's residence
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In 2b, check the box to show how you are sending the document.

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c. On 07/03/2022 at: 10:15  a.m.  p.m.  
Date Time

In c, fill in the date and time that you are sending the document.

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I have completed an *Additional Proof of Delivery* form.

Under the Code of Civil Procedure, [735 ILCS 5/1-109](#), making a statement on this form that you know to be false is perjury, a Class 3 Felony.

**I certify that everything in the *Proof of Delivery* is true and correct. I understand that a false statement on this form is perjury and has penalties provided by law under [735 ILCS 5/1-109](#).**

/s/ Megan Mason 419 Greenleaf Ave  
Your Signature Street Address

Megan Mason Wilmette, IL 60091  
Print Your Name City, State, ZIP

megan42@gmail.com (917) 518-1808  
Email Telephone

If you are completing this form on a computer, sign your name by typing it. If you are completing it by hand, sign and print your name.

Enter your complete address, telephone number, and email address if you have one.

**GETTING COURT DOCUMENTS BY EMAIL:** You should use an email account that you do not share with anyone else and that you check every day. If you do not check your email every day, you may miss important information, notice of court dates, or documents from other parties.



In **2**, if you are sending the document to more than 1 party or lawyer, fill in **a**, **b**, and **c**. Otherwise leave **2** blank.

In **2a**, enter the name, mailing address, and email address of the party you are sending the document to. If they have a lawyer, you **must** enter the lawyer's information.

In **2b**, check the box to show how you are sending the document. **CAUTION:** If you and the person you are sending the document to have an email address, you **must** use one of the first two options. Otherwise, you may use one of the

In **c**, fill in the date and time that you are sending the document.

**2. I am sending this document:**

a. To:

Name: \_\_\_\_\_  
First Middle Last

Address: \_\_\_\_\_  
Street, Apt # City State ZIP

Email address: \_\_\_\_\_

b. By:

- An approved electronic filing service provider (EFSP)
- Email (not through an EFSP)

*Only use one of the methods below if you do not have an email address, or the person you are sending the document to does not have an email address.*

- Personal hand delivery to:
  - The party
  - The party's family member who is 13 or older, at the party's residence
  - The party's lawyer
  - The party's lawyer's office
- Mail or third-party carrier

c. On: \_\_\_\_\_ at: \_\_\_\_\_  a.m.  p.m.  
Date Time

Under the Code of Civil Procedure, [735 ILCS 5/1-109](#), making a statement on this form that you know to be false is perjury, a Class 3 Felony.

If you are completing this form on a computer, sign your name by typing it. If you are completing it by hand, sign and print your name.

Enter your complete address, telephone number, and email address, if you have one.

**I certify that everything in the *Proof of Delivery* is true and correct. I understand that a false statement on this form is perjury and has penalties provided by law under [735 ILCS 5/1-109](#).**

/s/ Megan Mason  
*Your Signature*

419 Greenleaf Ave.  
*Street Address*

Megan Mason  
*Print Your Name*

Wilmette, IL 60091  
*City, State, ZIP*

(917) 518-1808  
*Telephone*

megan42@gmail.com  
*Email*

\_\_\_\_\_  
*Attorney # (if any)*

**GETTING COURT DOCUMENTS BY EMAIL:** You should use an email account that you do not share with anyone else and that you check every day. If you do not check your email every day, you may miss important information, notice of court dates, or documents from other parties.

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 REGARDING MICHAEL BENDER'S  
PETITION FOR RULE TO SHOW CAUSE**

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:

To the best of my abilities I have complied with and will continue to comply with the laws of this land and orders of this Court. I am not willfully violated any court order and deny any allegations that I have. I am ready and willing to comply with any court order to the best of my ability.

Specifically:

I have paid any and all funds available to me to fill this court order but I cannot pay money I do not have. As of this writing on July 3, 2022, I have personal bank accounts at Alliant Credit Union and Chase Bank. My savings account at Alliant Credit Union has no funds. My checking account at Chase Bank, ending 7569 has a present balance of \$321.79. These are the only funds available to me to pay for living expenses and food for myself and my children until my next paycheck on July 15, 2022. I also have a 401K held at Jefferies Financial, LLC, valued at less than \$10,000, the entire balance of which is used to secure a loan used to pay legal debt. I own a

Exhibit A Continued

car, used to transport myself to work and to transport my children to school and activities, but that is also secured by a loan and has no value to the court. I have no other property or possessions of value.

Over the last few years I have attempted to feed and clothe my children while meeting massive legal debt and expenses. Because of my desperation, namely to avoid incarceration, loss of my career and impacts to my parenting rights, I have until this point incurred massive amounts of high interest debt, exclusively to meet legal debts and court imposed fees. At present these debts are around \$85,000 with an average interest rate of 20%. I am in the process of filing Section 7 Bankruptcy and therefore cannot in conscience take on new debt to pay any expense, even a court order. And truthfully I do not know that more debt is available to me through legal lenders.

Nevertheless, despite these challenges, I attempted to remain current on my court ordered obligation to Michael Bender by paying whatever funds were available to me. On January 25, 2022 a payment of \$50 was sent to Caesar Bender toward this debt, months later my bank informed me the check was still not cashed and the payment was canceled. Again in February and March I sent payments through Chase bill pay in the amount I could afford, in earnest effort to remain current on my obligations, to the best of my ability, and they were not cashed by Caesar Bender LLP. Caesar Bender continues to refuse these payments.

In the spring of 2022 I began filing Section 7 bankruptcy in the Northern District of Illinois. I was informed through creditors that I needed to stop making payments on all debts. It is my understanding that the bankruptcy trustee determines payment amounts and schedules. Although I do understand that support orders, including GAL fees, are generally not discharged through bankruptcy, in an attempt to comply with federal bankruptcy law I paused payments on all debts as I prepared my bankruptcy pleadings.

Exhibit A Continued

As should be obvious from the above statements, I cannot afford \$500 per month to pay to Michael Bender. I would like to note that Illinois law does allow for litigants like myself to appeal through the court through a motion for financial allocation in situations where a litigant cannot pay court ordered fees. On November 24, 2020 I filed in this court a Motion for Allocation of Fees which as of this writing is still pending and has not been ruled upon through trial of fact. Petitioner in this case, Peter Matt, has not responded to this Motion. I have legally and truthfully presented in writing a basis for these fees to be allocated to Mr. Matt, abundant evidence that I cannot afford these fees - as is obvious by my lack of funds to pay them at present - and it would be a perversion of justice to incarcerate me without granting me a right to a fair hearing on my motion to allocate fees. I would ask that this allocation of fees motion be heard and ruled upon legally, in a neutral venue, before any ruling on Mr. Bender's petition be made.

I would also like to note that I do not believe Michael Bender's petition referenced in this pleading ought to be heard, much less ruled upon, until such time as it can be brought before a neutral judge in a neutral court. Namely, since May 19, 2022, the following parties have known that they are defendants in federal suit 1:22-cv-02315 in which I and the minor children Angus and Theodore Matt are plaintiffs:

- The Circuit Court of Cook County, Illinois
- Iris Martinez, Clerk of the Circuit Court of Cook County, Illinois
- Judge Grace Dickler, Presiding Judge of the Circuit Court of Cook County
- Judge Robert Johnson, personally
- Kaye Mason, Judge Robert Johnson's Clerk, personally
- Michael Bender, Guardian Ad Litem; personally
- Christopher Wehrman, Opposing Counsel



Exhibit A Continued

- Steven Klein, Opposing Counsel

It seems merely a matter of obvious administrative duty for Judge Dickler and Judge Johnson to order this case to a neutral venue. This is not to impugn Judge Johnson's reputation in any way, but it is on the face of it obvious that Judges Johnson and Dickler have more, far more, than a de minimis interest in whether or not I am incarcerated or otherwise obstructed from giving testimony and pursuing my just suit in federal court. I and my children have incurred millions of dollars in damages for which these two individuals, I allege, are personally liable. The conflict of interest is obvious as is the appropriate course of action and the impossibility of legitimate ruling until such time as that action is taken.

On Friday, July 1 at 3:30pm I entered and served on these parties an Emergency Motion for Stay of Proceedings and Transfer (Exhibit E). This formally asks parties to comply with the law and grant me the right to trial before a neutral judge in a neutral venue. On the face of it, this matter must be brought before a neutral judge in a neutral venue.

I have complied with the orders of this court without exception for seven years and I remain willing to comply with orders of this court to the best of my ability. It would be impossible for this court to make a determination as to my ability to pay these fees without hearing and ruling on a just motion for allocation of fees. It would be impossible to find me willfully in contempt because I cannot pay funds I do not have.

Respectfully Submitted,

/S/ Megan Mason

---

MEGAN MATT n/k/a MASON  
July 3, 2022

419 Greenleaf Ave.  
Wilmette, IL 60091



## Secure Messages

Inbox (17)

Sent messages

Special offers

[< Inbox](#)



**Sent** Apr 26, 2022 3:48 AM

**From** Online Banking

**Subject** We've placed a stop payment on the check you sent



[Delete](#)

[Reply](#)

Dear MEGAN E MASON:

We've stopped payment on a check for the payment listed below, either because you asked us to or it has expired after 90 days.

Payment to Caesar Bender LLP from account 7569 for \$50.00, to be delivered by 01/25/2022.

We'll refund the amount to your account within the next 5 business days.

If you use personal financial management software, such as Quicken(R) or Microsoft Money(R), please look at your payment details for the most up-to-date information.

Have questions? We offer many answers, and other ways to reach us, at [chase.com](http://chase.com).

Please don't reply to this automatically generated email.



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## Secure Messages

Inbox (18)

Sent messages

Special offers

[< Inbox](#)



**Sent** May 24, 2022 3:54 AM  
**From** Online Banking  
**Subject** We've placed a stop payment on the check you sent



[Delete](#)

[Reply](#)

Dear MEGAN E MASON:

We've stopped payment on a check for the payment listed below, either because you asked us to or it has expired after 90 days.

Payment to Caesar Bender LLP from account 7569 for \$50.00, to be delivered by 02/23/2022.

We'll refund the amount to your account within the next 5 business days.

If you use personal financial management software, such as Quicken(R) or Microsoft Money(R), please look at your payment details for the most up-to-date information.

Have questions? We offer many answers, and other ways to reach us, at [chase.com](http://chase.com).

Please don't reply to this automatically generated email.



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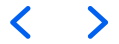
## Secure Messages

Inbox (18)

Sent messages

Special offers

[< Inbox](#)



**Sent** Jun 22, 2022 3:47 AM

**From** Online Banking

**Subject** We've placed a stop payment on the check you sent



[Delete](#)

[Reply](#)

Dear MEGAN E MASON:

We've stopped payment on a check for the payment listed below, either because you asked us to or it has expired after 90 days.

Payment to Caesar Bender LLP from account 7569 for \$50.00, to be delivered by 03/23/2022.

We'll refund the amount to your account within the next 5 business days.

If you use personal financial management software, such as Quicken(R) or Microsoft Money(R), please look at your payment details for the most up-to-date information.

Have questions? We offer many answers, and other ways to reach us, at [chase.com](https://www.chase.com).

Please don't reply to this automatically generated email.

Exhibit C

FILED  
11/24/2020 2:53 PM  
DOROTHY BROWN  
CIRCUIT CLERK  
COOK COUNTY, IL  
2016D009534

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

IN RE THE FORMER MARRIAGE OF: )  
)  
PETER MATT, )  
)  
                  *Petitioner,* )  
)  
                  and )  
)  
MEGAN MATT, )  
                  n/k/a MEGAN MASON, )  
)  
                  *Respondent.* )

11258666

Case No. 2016 D 009534

**Motion for Allocation of GAL Fees, Extraordinary Healthcare Costs, 604B Investigation Costs, and Attorney Fees for Megan Mason**

I, Megan Mason, acting pro se, humbly ask the court to consider my plea for a just allocation of fees related to the medical care of our minor children Angus and Theodore Matt. Because of Angus Matt’s unique special medical needs, this encompasses a wide range of costs directly and indirectly related to his care and to the organization and compensation of professionals assisting with his care. I will present this motion at our scheduled appearance on December 3, 2020.

1. The issue of who should be responsible for costs related to the care of the minor children Angus and Theodore Matt has been a matter of debate before this court on prior occasions. Specifically, Megan Mason has asserted that Peter Matt is independently wealthy and supported by his even wealthier father and should therefore pay a larger portion of fees.

2. Mr. Matt has disputed this assertion on prior occasions.

3. In the matter of Michael Bender’s fees and the cost of the children’s healthcare, the court has ordered that allocation be revisited through an order entered on November 20, 2019 for medical expense allocation to be revisited and on a June 9, 2019 order, parties were ordered

FILED DATE: 11/24/2020 2:53 PM 2016D009534

Exhibit C Continued

to exchange Financial Affidavits within 28 days and to revisit the Allocation of GAL and other fees.

4. Megan Mason presented financial affidavits and complete supporting documents on July 24, 2019 through her then attorney as requested and Peter Matt's attorney confirmed receipt. Megan Mason has subsequently provided to Peter Matt through counsel her updated financial affidavit presented here for the court. (Exhibit A.) she has also disclosed supporting financial statements and tax forms and indicated a willingness to provide any requested documentation.

5. On July 3, 2019 Peter Matt presented a Financial Affidavit and a checking account statement showing a balance of \$0 and a single tax form showing \$26,000 in salary. (Exhibit B, Exhibit C, Exhibit D) Megan Mason raised to Peter Matt's counsel that the financial affidavit provided by Peter Matt was incomplete and missing vital information. Specifically, Megan Mason pointed out that the financial affidavit grossly under-represented Peter Matt's wealth and access to his father's wealth as an ongoing source of support prior to the marriage, during the marriage, during the divorce proceedings and at present. Megan asked for clarification on a multitude of material financial issues which Peter Matt refused. (Exhibit E)

6. Peter Matt refused to respond to requests for supporting documents and clarification. Peter Matt also refused to update his financial affidavit, therefore his financial affidavit must be regarded as final.

7. I ask that the Court please consider the appropriate Allocation of fees. I also ask that the Court consider the gross misrepresentations made in Peter Matt's financial disclosures and his refusal to clarify when considering just allocation of fees.

8. Peter Matt intentionally deceived the court by grossly under-representing his income, wealth and access to parental support. Specifically:

Exhibit C Continued

a. Peter Matt's Business Bank Accounts

- i. Peter Matt has on prior occasion submitted to this court that he owns four businesses: Goedecke US, Goedecke Germany, Goedecke Poland, and Goedecke India (Exhibit F)
- ii. Peter Matt refuses to provide bank statement for any of the business bank accounts he controls or are controlled by his father for Peter Matt's benefit, specifically: ING Poland Account Number 96 1050 1025 1000 0090 7475 0911(Exhibit G), Postbank Germany (Exhibit H), Northshore Community Bank and Trust (Exhibit J), Goedecke India Bank Accounts, any Goedecke business accounts not listed.
- iii. Paypal accounts for India, Poland, Germany and the US (Exhibit I)

b. Peter Matt's business entity and tax forms, specifically:

- i. Goedecke US tax filings in the US and other countries
- ii. Goedecke Germany's tax filings in the US and Germany
- iii. Goedecke Poland's tax filings in the US and Poland
- iv. Goedecke India's tax filings in the US and India

9. Peter Matt has routinely used business accounts controlled by him, his father, Leo Matt, or both parties in order to pay for his personal expenses. (Exhibit K)

10. This use of parental support through supposed businesses and gifts predates the marriage and was an ongoing source of familial income while both parties were married. Particular scrutiny ought to therefore be given to Peter Matt's businesses and the omission of these details ought to be regarded as specifically intended to deceive the court as to his means.

Exhibit C Continued

11. As further evidence of the commingling of business and personal assets, Peter Matt uses his home address and his father's home address as the business address for his multiple bank accounts (Exhibit G, Exhibit H, Exhibit J).

12. As further evidence of his father's undisclosed contribution, European business expenses are paid by Leo Matt's personal credit cards, not disclosed or included in his financial disclosures (Exhibit I).

13. Peter Matt declared on his financial affidavit that he receives \$3,583 in dividend income. He refuses to describe the source of this income or to disclose supporting documents such as tax filings or bank accounts.

14. Peter Matt refuses to disclose if he is employed and by whom.

15. Peter Matt claims that his income is less than 10% of what he claimed four months prior to marital separation in financial statements shared with Megan Mason by Peter Matt and by his father Leo Matt. He refuses to provide an explanation for this dramatic reduction in income. (Exhibit L, Exhibit M).

16. Peter Matt claimed in a meeting with John Palen and Megan Mason on November 23rd, 2020 that his income is about \$26,000 annually. In the same conversation he claimed that extraordinary healthcare costs in the amount of \$20,000 annually are appropriate and necessary. This defies logic and is further evidence of brazen deceit.

17. Mr. Matt also claims to have a mortgage and to own a property in East Wilmette that Zillow values at over \$882,000 (Exhibit N). Mr. Matt refuses to provide a proof of the mortgage, title or other property details. Given that Mr. Matt's wealthy father supports him in many ways, the court should consider that Mr. Matt's home is paid for by his father, unless he

FILED DATE: 11/24/2020 2:53 PM 2016D009534



Exhibit C Continued

can prove otherwise. This is further evidence of the extraordinary financial means available to Mr. Matt while Megan Mason must pay for her own housing..

18. Megan Mason worked as the accountant for Goedecke and its international businesses (at that time Goedecke India and Goedecke Poland) until 2012. She is qualified to speak to the operation of Peter’s businesses as well as common standards in business accounting and tax. In 2012 Megan Mason withdrew from all financial operations because of concern for Mr. Matt’s financial dealings and their disagreement over the interpretation of US tax laws.

Specifically:

- a. In 2011 Mr. Matt inherited \$800,000 in Germany which Megan Mason believed should be declared on the US tax forms. Mr. Matt would not do this.
- b. Peter Matt then claimed to gift the \$800,000 to his father who in turn has made “Business Loans” to Peter Matt over the years.
- c. Peter’s father, Leo Matt, subsequently advanced part of Mr. Matt’s inheritance from his own large estate in the form of “Business Loans”

19. Megan Mason has always fully disclosed her financial status and pays taxes in accordance with a traditional interpretation of tax law and should therefore be treated as more credible in all financial matters.

20. Given the preponderance of evidence of hidden accounts and commingling of business and personal assets as well as the continued access to gifts, the Court ought to treat with particular scrutiny any assertions by Peter Matt as to his financial means.

21. Given that Mr. Matt has untold resources with which to maintain his lifestyle and to continue his profligate use of the judicial system, he can afford to contribute significantly more to the well being of the minor children than Megan Mason can.

Exhibit C Continued

22. Given the unequal financial means available to both parties, I humbly ask that the court order that:

- a. **Peter Matt be ordered to pay Michael Bender, GAL, the outstanding balance as of \$2,478.50 as of November 15, 2020. Peter Matt agrees to be responsible for 100% of Michael Bender's fees going forward until an order is entered removing Michael Bender from this case.** Peter Matt will pay Michael Bender within 30 days of receipt of an invoice.
- b. **Peter Matt be ordered to pay John Palen's fees** in full until such time as John Palen is removed by the court. Peter Matt will pay Michael Bender within 30 days of receipt of an invoice.
- c. Because of Angus Matt's special medical and educational needs, extraordinary medical expenses are often incurred. **Peter Matt shall be fully responsible for all medical costs beyond health insurance premiums.** This includes ABA therapy, occupational therapy, therapeutic sports or recreational programs, medical specialists, and any other expense deemed medically necessary by any parent with medical or educational decision making rights. This includes any past, present or future obligations described as "medical expenses".
- d. Because the Allocation of Parenting responsibilities and Marital Settlement Agreement have proven ineffective to meet the needs of the minor children in this case and have created opportunities for excessive litigation, future negotiation and the drafting of new orders is necessary. Megan Mason cannot afford an attorney to properly support her in this matter. Peter Matt is independently wealthy and is

Exhibit C Continued

regularly supported by his wealthy father. **Peter Matt should be responsible for Megan Mason's necessary legal fees, in the amount of up to \$20,000 annually.**

- e. **Peter Matt will be fully responsible for the cost of a 604B evaluation should one prove necessary.**

PRESENTED BY:



---

Megan (Matt) Mason, pro se,

November 24, 2020

Exhibit E

TOTAL CHECKING (...7569) | [See full account number >](#)



\$321.79

Available balance:

The amount of money in your account that you can use right now. You can find this balance on receipts you receive at ATMs, from a banker at a branch, at chase.com or in the Chase Mobile app.

+\$0.00

Deposits this month

Off | [Set up >](#)  
Debit card coverage

-\$1,897.50

Withdrawals this month

Off | [Set up >](#)  
Overdraft protection

[Paperless](#)

[Transfer money](#)

[More](#)



Megan M &lt;megan42@gmail.com&gt;

## Filing Submitted for Case: 2016D009534; PETER MATT-vs-MEGAN MATT; Envelope Number: 18528267

1 message

no-reply@efilingmail.tylertech.cloud <no-reply@efilingmail.tylertech.cloud>  
To: megan42@gmail.com

Fri, Jul 1, 2022 at 3:34 PM



## Filing Submitted

Envelope Number: 18528267  
Case Number: 2016D009534  
Case Name: PETER MATT-vs-MEGAN MATT

The filing below has been submitted to the clerk's office for review and assigned **Envelope Number: 18528267**. You will be notified by email in 24-48 hours if your filing has been accepted or rejected.

Filing Details	
<b>Court</b>	Cook County - Domestic Relations - District 1 - Chicago
<b>Date/Time Submitted</b>	7/1/2022 3:29 PM CST
<b>Filing Type</b>	EFileAndServe
<b>Filing Description</b>	Emergency Motion to Stay Proceedings and Transfer Venue
<b>Filing Code</b>	Motion Filed
<b>Filed By</b>	Megan Mason
<b>Filing Attorney</b>	

Fee Details	
Your account is never charged until your filing is accepted. If you see any pending charges on your account prior to acceptance, this is an authorization hold to ensure the funds are available so your filing can be accepted without delay.	
If the filing is canceled or rejected these funds will be released and will return to your account according to your financial institution's policies (typically 3-10 business days).	
This envelope is pending review and fees may change.	
Case Fee Information	\$0.00
Motion Filed	\$0.00
<b>Total:</b> \$0.00 (The envelope still has pending filings and the fees are subject to change)	

Document Details	
<b>Lead Document</b>	Emergency Motion for Stay of Proceedings and Transfer of Venue.pdf
<b>Lead Document Page Count</b>	101
<b>File Copy</b>	<a href="#">Download Document</a>
This link is active for 660 days.	

If the link above is not accessible, copy this URL into your browser's address bar to view the document:  
<https://illinois.tylerhost.net/ViewDocuments.aspx?FID=c79bf762-9f93-4abe-b17b-53b4052fef4b>

This form is approved by the Illinois Supreme Court and is required to be accepted in all Illinois Circuit Courts.

<b>STATE OF ILLINOIS, CIRCUIT COURT</b>  Cook <input type="checkbox"/> COUNTY	<b>MOTION</b>	For Court Use Only
Instructions ▼ Directly above, enter the name of the county where the case was filed. Enter the name of the person who started the lawsuit as Plaintiff/Petitioner. Enter the name of the person being sued as Defendant/Respondent. Enter the Case Number given by the Circuit Clerk.	Peter Matt <hr/> <b>Plaintiff / Petitioner</b> <i>(First, middle, last name)</i>  V.  Megan Matt (NKA Megan Mason) <hr/> <b>Defendant / Respondent</b> <i>(First, middle, last name)</i>	<hr/> 2016 D 9534 <b>Case Number</b>

In 1, check if you are the Plaintiff/Petitioner or Defendant/Respondent.

In 2, enter what you are asking the court for with this *Motion*.

In the lines write what you are asking the court to do, and the reasons why the judge should agree with you.

1. **Motion by:**     Plaintiff/Petitioner             Defendant/Respondent
2. **Motion for:**    Emergency Motion for Stay of Proceedings and Transfer of Venue

I, Megan Mason, Pro Se Plaintiff in case 2016 D 9534, and mother to children A [redacted] and T [redacted] move that all rulings or proceedings currently before the Circuit Court of Cook County in the aforementioned case be stayed until such time as this case be transferred to a neutral venue outside Cook County, Illinois. I further move that Judge Johnson, upon receipt of this motion immediately order this case be transferred to Presiding Judge Grace Dickler in order that this case be transferred out of Cook County.

**I request that this motion be heard on an emergency basis.**

The basis for my request is that: The Circuit Court of Cook County is defendant in Federal Case 1:22-CV-2315 (Exhibit A, Exhibit F); Judge Robert Johnson, presently presiding over case 2016 D 9534 is also personally named as a defendant in federal lawsuit (Exhibit B); Presiding Judge Grace Dickler, who acts in administrative authority over defendants named in this suit, is also named as a defendant in this federal suit (Exhibit C); Chief Judge Timothy Evans, who is the executive leader of the Circuit Court of Cook County, is also named as a defendant in this federal suit (Exhibit D); Iris Martinez, Clerk of the Circuit Court of Cook County, is in authority over all records and in direct control of all employees who manage filings and records for case 2016 D 9534 a is also a defendant in this federal suit (Exhibit E) ; Kaye Mason, who currently decides what matters may be scheduled before Judge Johnson, including proceedings in Case 2016 D 9534, is also a defendant in this federal suit. I cannot receive a fair hearing in a case where parties I am suing in federal court, some of whom on the basis that I have alleged they committed felony acts against me and my children, have direct authority over my and my children's well being.

(Continued)

The Illinois Code of Judicial Conduct Canon 3C requires that:

“ A judge shall disqualify himself or herself in a proceeding in which the judge's impartiality might reasonably be questioned, including but not limited to instances where:...

“(d) the judge knows that he or she, individually or as a fiduciary, or the judge's spouse, parent or child wherever residing, or any other member of the judge's family residing in the judge's household, has an economic interest in the subject matter in controversy or in a party to the proceeding, or has any other more than de minimis interest that could be substantially affected by the proceeding; or...

“(iii) is known by the judge to have a more than de minimis interest that could be substantially affected by the proceeding; or,”

Because I am suing Judge Johnson and Judge Dickler personally for financial damages they have more than a de minimis interest in the outcome of divorce proceedings related to me. A judge ought not to preside over a case wherein a litigant is simultaneously suing that judge in a federal lawsuit.

Immediate disqualification is necessary and immediate transfer is necessary.

Our judiciary is intended to be neutral, so presumably the Court and its employees can have no legal interest in preventing a transfer.

Parties in Case 2016 D 9534 have a duly enacted parenting plan and by law any domestic relations matter may be heard in any county in the state. Lake County courthouse is convenient to both parties and the the drive time approximately the same as the present venue.

**Wherefore** in the interest of justice I request that:

All matters in case 2016 D 9534 be stayed until such time as they may be heard in a neutral venue;

This case be transferred to neutral venue such as Lake County, Illinois;

Judge Robert Johnson immediately cease actions in the role of presiding judge in case 2016 D 9534.

**Affidavit in Statement of emergency basis:**

I affirm that this motion must be heard at the earliest possible time in the interest of justice. Although I have been divorced for six years, I and my ex husband, Peter Matt, ought to have access to a neutral court of justice which is impossible until such time as the individuals being sued in federal case 1:22-CV-2315 are removed or remove themselves from any involvement in Illinois case 2016 D 9534. It is not appropriate to allow hearing on these matters to be heard until such time as this case is heard in a neutral venue before a neutral judge. Without making any opinion as to the merits of federal suit 1:22-CV-2315, one can clearly see that a judge who is being sued by a litigant, should not preside over a case involving that litigant.

Respectfully Submitted by

/S/ Megan Mason  
Megan Mason, Defendant Pro Se  
July 1, 2022

Under the Code of Civil Procedure, [735 ILCS 5/1-109](#), making a statement on this form that you know to be false is perjury, a Class 3 Felony.

If you are completing this form on a computer, sign your name by typing it. If you are completing it by hand, sign and print your name.

Enter your complete current address and telephone number.

**I certify that everything in the *Motion* is true and correct. I understand that making a false statement on this form is perjury and has penalties provided by law under 735 ILCS 5/1-109.**

/s/ Megan Mason  
 \_\_\_\_\_  
 Your Signature

Megan Mason  
 \_\_\_\_\_  
 Print Your Name

## PROOF OF DELIVERY

1. I sent this document:

a. To:

Name: Christopher Wehrman

*First Middle Last*

Address: 2345 Waukegan Rd Suite 150, Bannockburn, IL 60015

*Street, Apt # City State ZIP*

Email address: cwehrman@kglaw.com

b. By:  Personal hand delivery

Regular, First-Class Mail, put into the U.S. Mail with postage paid at:

\_\_\_\_\_  
*Address of Post Office or Mailbox*

Third-party commercial carrier, with delivery paid for at:

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Email (*not through an EFM or EFSP*)

Mail from a prison or jail at:

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*Name of prison or jail*

c. On: July 1, 2022  
*Date*

At: 3:15  a.m.  p.m.  
*Time*

2. I sent this document:

a. To:

Name: Michael Bender

*First Middle Last*

Address: 410 N. Michigan Ave., Suite 400 Chicago, IL 60611

*Street, Apt # City State ZIP*

Email address: mbender@caesarbenderlaw.com

In **1a**, enter the name, mailing address, and email address of the party or lawyer to whom you sent the document.

In **1b**, check the box to show how you sent the document, and fill in any other information required on the blank lines.

**CAUTION:** If the other party does not have a lawyer, you may send the document by email only if the other party has listed their email address on a court document.

In **c**, fill in the date and time that you sent the document.

In **2**, if you sent the document to more than 1 party or lawyer, fill in **a**, **b**, and **c**. Otherwise leave **2** blank.



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- The court's electronic filing manager (EFM) or an approved electronic filing service provider (EFSP)
- Email (*not through an EFM or EFSP*)
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*Name of prison or jail*

c. On: July 1, 2022  
*Date*

At: 3:15  a.m.  p.m.  
*Time*

In 3, if you sent the document to more than 2 parties or lawyers, fill in a, b, and c. Otherwise leave 3 blank.

3. I sent this document:

a. To:

Name: Steven Klein  
*First Middle Last*

Address: Katz, Goldstein & Warren 2345 Waukegan Rd Suite 150, Bannockburn, IL 60015  
*Street, Apt # City State ZIP*

Email address: sklein@kglaw.com

- b. By:  Personal hand delivery
- Regular, First-Class Mail, put into the U.S. Mail with postage paid at:

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*Address of Post Office or Mailbox*

- Third-party commercial carrier, with delivery paid for at:

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*Name (for example, FedEx or UPS ) and office address*

- The court's electronic filing manager (EFM) or an approved electronic filing service provider (EFSP)
- Email (*not through an EFM or EFSP*)
- Mail from a prison or jail at:

\_\_\_\_\_  
*Name of prison or jail*

c. On: July 1, 2022  
*Date*

At: 3:15  a.m.  p.m.  
*Time*

If you sent your document to more than 3 parties or lawyers, check the box and file the *Additional Proof of Delivery* form with this form.

- I have completed an *Additional Proof of Delivery* form.

Under the Code of Civil Procedure, [735 ILCS 5/1-109](#), making a statement on this form that you know to be false is perjury, a Class 3 Felony.

If you are completing this form on a computer, sign your name by typing it. If you are completing it by hand, sign and print your name.

**I certify that everything in the Proof of Delivery is true and correct. I understand that making a false statement on this form is perjury and has penalties provided by law under [735 ILCS 5/1-109](#).**

/s/ Megan Mason  
*Your Signature*

Megan Mason  
*Print Your Name*

# Case # 2016D009534 - PETER MATT-vs-MEGAN MATT (Calendar, 23)

## Envelope Information

<b>Envelope Id</b> 18531696	<b>Submitted Date</b> 7/3/2022 10:47 AM CST	<b>Submitted User Name</b> megan42@gmail.com
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## Case Cross Reference Number

<b>Case Cross Reference Number</b> 99500	<b>Case Cross Reference Type</b> Cook County Attorney Code
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## Case Information

<b>Location</b> Cook County - Domestic Relations - District 1 - Chicago	<b>Category</b> Domestic Relations - General Proceedings	<b>Case Type</b> Petition For Dissolution
<b>Case Initiation Date</b> 10/13/2016	<b>Case #</b> 2016D009534	
<b>Assigned to Judge</b> Calendar, 23		

## Filings

<b>Filing Type</b> EFileAndServe	<b>Filing Code</b> Answer/Response/Reply Filed
-------------------------------------	---

**Filing Description**  
Defendant's Response to Michael Bender's  
PRTSC filed 20 June 2022

**Filing Status**  
Submitting

## Lead Document

File Name	Description	Security	Download
Response Bender PRTSC Fees.pdf	Answer/Response/Reply Filed	Non-Confidential	Original File

## eService Details

Status	Name	Firm	Served	D	Help
Not Sent	Megan Mason		No	No	Open

Status	Name	Firm	Served	Date Opened
Not Sent	Megan Elizabeth Mason		No	Not Opened

## Parties with No eService

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Name	Address
PETER MATT	
MEGAN MATT	
Megan (Matt) Mason	
CAESAR&BENDER LLP	150 N MICHIGAN#2800 CHICAGO Illinois 60601

## Fees

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### Answer/Response/Reply Filed

Description	Amount
Filing Fee	\$0.00
<b>Filing Total: \$0.00</b>	

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Total Filing Fee	\$0.00
<b>Envelope Total: \$0.00</b>	

<b>Transaction Amount</b>	\$0.00
<b>Transaction Id</b>	29593410
<b>Order Id</b>	
<b>Transaction Response</b>	Authorized