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

Case No. 2016 D 009534

**RESPONDENT’S MOTION TO DISMISS DEFENDANT’S MOTION FOR SUPREME  
COURT RULE 215 EXAMINATION**

I, Megan Mason, respondent pro se, move that this court dismiss petitioner’s Motion for Supreme Court Rule 215 Exam.

1. On June 28, 2020 Petitioner filed a Motion for Supreme Court Rule 215 Exam (**Exhibit A**).
2. Under 735 ILCS 5/2-615 a party in Illinois may move to have a pleading dismissed where that pleading is substantially insufficient under the law.
3. Specifically petitioner’s Motion for Supreme Court Rule 215 Exam should be dismissed because it is substantially insufficient under the law in the following ways:
  - a. The pleading is supported by no evidence other than the parties’ divorce agreement and parenting plan which was accepted and approved by an Illinois judge in 2017 and to my awareness have never before been presented as proof of my mental incompetence.

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- b. Petitioner does not indicate what trying this examination is required for and so it would be impossible to determine if fair notice has been given as per Rule 215.
- c. No medical expert is called or expected to present evidence in support of this proposed action.
- d. A recent committee note regarding rule asserts that, *“a trial court may order impartial medical examinations only where the parties have presented conflicting medical testimony, reports or other such documentation which places a party's mental or physical condition ‘in issue’ and, in the court's discretion, it appears that the examination will materially aid in the just determination of the case. Mere allegations are insufficient to place a party's mental or physical condition ‘in issue.’”*.
- e. There have been no prior reports presented or medical testimony given. As it happens a prior parenting coordinator, psychologist Gerald Blechman, has administered multiple psychological examinations on myself and Mr. Peter Matt but to this date has refused to tender them or to reveal the findings.
- f. Plaintiff is required under this rule to state the practitioner and modality requested and fails to do so.
- g. Plaintiff's claims are not based in facts nor does plaintiff refer to facts in the pleading. One is particularly struck by the prevalence of generalizations and inferences and the absence of details that are typically associated with facts such as time, location, party, action, specific events or specific actions. Facts are necessary in order to conduct a trial of fact.

4. Dismissal of plaintiff's Motion for Rule 215 Examination is the only appropriate action under the law.
5. Under no circumstances should plaintiff's pleading be ruled upon until such time as parties who have a legal and ethical duty to remove conflicts of interest step down. Namely, the following parties are presently defendants or witnesses in ongoing federal criminal investigations into crimes in which I and my minor children are victims and witnesses: Judge Grace Dickler, Judge Robert Johnson, Kaye Mason, Christopher Wehrman, Steven Klein and Michael Bender. (Exhibit B).
6. Multiple parties acting as attorneys or appointees in this case have been questioned by federal law enforcement agents regarding criminal allegations and these investigations are serious and ongoing. I am in possession of documentary evidence and correspondence that indicate this investigation is active and ongoing.
7. Gerald Blechman, a psychologist and associate of the permanent guardian ad litem in this case, Michael Bender, has resigned on the advice of counsel due to his role in ongoing federal criminal investigations.
8. In addition to the criminal lawsuits, these parties are also named as witnesses and defendants in multiple federal civil lawsuits in which I am plaintiff.
9. It is impossible to separate official acts from personally motivated acts under these circumstances, which is why rules regarding conflict of interest are so strict and most attorneys and judges follow these rules as a matter of course.
10. As a federal witness I am entitled to protections under federal law which this court and all parties acting within and under the authority of this court must also afford me. Namely 18

U.S. Code § 1512 prevents the Tampering with a witness, victim, or an informant and imposes criminal penalties on anyone who:

*“knowingly uses intimidation, threatens, or corruptly persuades another person, or attempts to do so, or engages in misleading conduct toward another person, with intent to—*

*(1)influence, delay, or prevent the testimony of any person in an official proceeding;*

*(2)cause or induce any person to—*

*(A)withhold testimony, or withhold a record, document, or other object, from an official proceeding;*

*(B)alter, destroy, mutilate, or conceal an object with intent to impair the object’s integrity or availability for use in an official proceeding;*

*(C)evade legal process summoning that person to appear as a witness, or to produce a record, document, or other object, in an official proceeding;*  
*or*

*(D)be absent from an official proceeding to which such person has been summoned by legal process;”*

11. Under this rule, “an official proceeding need not be pending or about to be instituted at the time of the offense”.
12. Plaintiff’s counsel has orally and in written pleadings filed at the time of or around the time of this pleading referred to my role as a federal witness as a specific basis for financial and emotional retaliation. However, even where explicit reference has not been made, it is impossible to determine if any emotional punishment ordered by this court, such as forced separation from my children, or financial punishment in the form of fees and sanctions are legitimate or acts in furtherance of a party’s personal wish to engage in witness intimidation and interference and obstruction of justice.
13. Given that the pleading is, on the face of it, legally baseless and not supported by facts or evidence, it would be impossible to consider actions based on this pleading as anything

other than an act in furtherance of obstruction of justice, and intimidation of and retaliation toward a federal witness.

Wherefore, I pray that this court

- A. Dismiss this pleading and action entirely.
- B. Order Michael Bender, Kaye Mason, Steven Klein and Christopher Wehrman to withdraw from this case effective immediately due to their conflict of interest.
- C. That Judge Robert Johnson recuse himself from this case and that Judge Grace Dickler transfer this case out of Cook County due to his conflict of interest for both Judge Johnson and Judge Dickler.
- D. Any relief that this court deems fit.

Respectfully Submitted by,

Megan Mason

Respondent Pro Se

