

FILED
12/22/2022 1:22 PM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2016D009534
Calendar, 23
20785539

**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

**EMERGENCY MOTION TO DISMISS PETER MATT’S EMERGENCY PETITION
FOR AN EMERGENCY ORDER OF PROTECTION**

I, Megan Mason, respondent pro se in post-decree activity related to the divorce finalized in this court on September 25, 2017, move that the court immediately issue an order dismissing Mr. Matt’s EMERGENCY PETITION FOR AN ORDER OF PROTECTION. I fear for my safety and well being and that of my children if Mr. Matt is allowed to delay hearing on this Petition in order to have a specific judge issue a ruling, therefore I require emergency hearing on this Motion to Dismiss as stated in my Affidavit in Support of this Emergency Motion (Exhibit D).

In support of my motion I state as follows:

Facts

1. Mr. Matt filed an EMERGENCY MOTION FOR AN ORDER OF PROTECTION (Emergency Motion) seeking to prevent me from contacting my minor children, from speaking with their school staff or otherwise being involved in their lives on December 21, 2022 at around 10:50am. (Exhibit A).

FILED DATE: 12/22/2022 1:22 PM 2016D009534

2. Emergency petitions take precedence over other court matters. Mr. Matt provided an affidavit in support of ruling on his petition on an emergency, expedited basis.(Exhibit A)
3. On December 21, 2022, just before 6pm, court employee Diana Arroyo emailed Mr. Matt, by counsel Christopher Wehrman, the minor children's permanent guardian ad litem, Michael Bender, and myself, Respondent pro se. She wrote: "*Good Evening, Judge Pinzur-Rosenberg will hear this emergency motion tomorrow at 11:30am*" and provided parties with the Zoom details for the hearing (Exhibit B).
4. On or before December 22, 2022 all parties involved in this case, Mr. Matt via his attorney Christopher Wehrman, Michael Bender and myself were informed that Judge Robert Johnson would not be hearing motions for the twelve days following the filing of Mr. Matt's self described "emergency" action. I personally became aware of this fact when I received an automatic response from Judge Johnson's calendar email reading: "CALENDAR 23 WILL BE CLOSED ON DECEMBER 20, 2022 THROUGH JANUARY 2, 2023". (Exhibit C).
5. I believe Mr. Wehrman and Mr. Bender were aware of Judge Johnson's vacation at the same time I received this automatic reply, having received the same message.
6. On December 22, 2022 at around 10am, Mr. Wehrman wrote to Ms. Arroyo, "*Please be advised that we will not proceed with the hearing on the petition today, and will re-notice it to Judge Johnson's calendar when he returns.*" (Exhibit B).
7. Judge Johnson will not be hearing petitions for another eleven days from the date of Mr. Matt's stated emergency petition to seek a restraining order against me.
8. I am employed full time and left work to attend this hearing.

9. I viewed this email from Mr. Wehrman on December 22, 2022 just as I was logging in for the emergency court appearance Mr. Wehrman had requested. I wrote:

“I object to re-noticing in order to obtain a more favorable ruling. I ask that you appear before Judge Pinzur- Rosenberg as I am now doing. If you have come to the realization that your petition is without merit, I ask that you withdraw it. If you have come to the conclusion that it is not an emergency, having burdened many parties, including myself, I ask that you likewise withdraw it. It does not make sense to delay.” (Exhibit B)

10. At 11:30am on December 22, 2022, as scheduled, Mr. Wehrman, myself and Michael Bender appeared in Judge Ginsberg’s Zoom Meeting.
11. I was not given time to speak and Judge Ginberg stated that because Mr. Matt had decided not to have her rule on the motion that she would not let me speak. She stated without apparent basis, that she “would not give me legal advice”. I attempted to state that I did not seek legal advice, but I objected to her allowing a delay of hearing on Mr. Matt’s motion because it was described as an emergency.
12. Judge Ginsbert threatened me with contempt of court for persisting in my attempts to speak. She also questioned my friends who were in attendance in her public courtroom for their reason for being there. She abruptly decided to close her public zoom court.

Argument

13. Delaying ruling on a matter as serious as an order of protection in order to have that ruling be issued by a particular judge is on the face of it unjust. The court ought not to tolerate or encourage judge shopping.
14. A party must have a sincere wish to have expedited ruling on a matter in order to submit a petition on an emergency basis. By Mr. Matt’s attorney’s own statements and actions to delay ruling for eleven days, he has demonstrated without a doubt that this is not a

legitimate emergency. The court must therefore order him to withdraw the petition or dismiss it by order as he demonstrated it was not an emergency action, as stated.

15. Mr. Matt, by his counsel Mr. Wehrman, I and Michael Bender appeared at this action requested by Mr. Wehrman. The court ought to have dismissed the petition when Mr. Wehrman declined to prosecute his cause. I ask that it do so now.

Therefore I pray that this court:

- A. Issue an order dismissing **PETER MATT'S EMERGENCY PETITION FOR AN EMERGENCY ORDER OF PROTECTION**
- B. Any other relief that this court deems fit.

Respectfully Submitted by

Megan Mason
Respondent Pro Se Case 2016 D 9534
419 Greenleaf Ave.
Wilmette, IL 60091

PROOF OF DELIVERY

FILED DATE: 12/22/2022 1:22 PM 2016D009534

In **1a**, 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 **1b**, 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 other options.

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.

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 other options.

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

1. I am sending the Notice of Court Date for Motion

a. To:
 Name: Christopher Wehrman
First Middle Last
 Address: 2345 Waukegan Rd Suite 150Bannockburn, IL 60015
Street, Apt # City State ZIP
 Email address: cwherman@kglaw.com

- 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: 12/22/2022 at: 1:15 a.m. p.m.
Date Time

2. I am sending this document:

a. To:
 Name: Michael Bender
First Middle Last
 Address: 150 N. Michigan Ave., #2130Chicago, IL 60601
Street, Apt # City State ZIP
 Email address: mbender@caesarbenderlaw.com

- 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: 12/22/2022 at: 1:15 a.m. p.m.
Date

FILED DATE: 12/22/2022 1:22 PM 2016D009534

If you are sending your document to more than 2 parties or lawyers, check the box and file the *Additional Proof of Delivery* 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.

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

419 Greenleaf Ave.
Street Address

Megan Mason
Print Your Name

Wilmette, IL 60091
City, State, ZIP

(917) 518-1808
Telephone

megan42@gmail.com
Email

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.

Attorney # (if any)

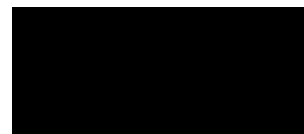
GETTING COURT DOCUMENTS BY EMAIL: You should use an email account that you do not share with anyone else and that you check every day. If you do not check your email every day, you may miss important information, notice of court dates, or documents from other parties.

On December 22, 2022, I appeared at a hearing on a stated Emergency Petition for an Order of Protection. Mr. Matt declined to prosecute his cause having previously stated that he only wants to have Judge Johnson rule on this action. I fear for my safety and well being and that of my children if Mr. Wehrman, who I have also accused under affidavit of multiple criminal acts, is allowed to judge shop.

In the interest of decency and justice I ask that swift action be taken to stop this by means of an order dismissing Mr. Matt's self stated emergency action.

Respectfully Submitted by

Megan Mason
Respondent Pro Se Case 2016 D 9534



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.
Remote Court Date: No hearing scheduled



Megan M <megan42@gmail.com>
FILED
12/22/2022 1:22 PM
IRIS Y. MARTINEZ
CIRCUIT CLERK
2016D009534
Calendar, 23
20785539

Re: Emergency Matt 2016 D 9534- Emergency NOM & Petition for Emergency Order of Protection

6 messages

Diana Arroyo (Chief Judge's Office) <Diana.Arroyo@cookcountyl.gov> Wed, Dec 21, 2022 at 5:51 PM
To: "CCC DomRelCR2108 (Chief Judge's Office)" <Ccc.Domrelcr2108@cookcountyl.gov>, "Cc: Christopher D. Wehrman" <CWehrman@kgwlaw.com>, Megan Mason <[REDACTED]>, Michael I Bender <mbender@caesarbenderlaw.com>, Aneta Sniadala <ASniadala@kgwlaw.com>

Good Evening,

Judge Pinzur-Rosenberg will hear this emergency motion tomorrow at 11:30am. Please log on to her Zoom at that time.

Zoom ID: 843 7608 0114 ; Pass: 086627

Thank you,

Diana (Dee-ah-nah) Arroyo (She/Her/Ella)

Division Attorney, Domestic Relations

Circuit Court of Cook County

Richard J. Daley Center

[50 W. Washington](#), 1901D

Chicago, IL 60602

Main Office: (312) 603-5281

Fax: (312) 603-6453

From: Aneta Sniadala <ASniadala@kgwlaw.com>
Sent: Wednesday, December 21, 2022 11:51 AM
To: CCC DomRelCR2108 (Chief Judge's Office) <Ccc.Domrelcr2108@cookcountyl.gov>
Cc: Christopher D. Wehrman <CWehrman@kgwlaw.com>; Megan Mason <[REDACTED]>; Michael I Bender <mbender@caesarbenderlaw.com>
Subject: RE: Matt 2016 D 9534- Emergency NOM & Petition for Emergency Order of Protection

External Message Disclaimer

This message originated from an external source. Please use proper judgment and caution when opening attachments, clicking links, or responding to this email.

Dear Clerk,

Attached please find courtesy copies of Emergency Notice of Motion and Peter Matt's Petition for Emergency Order of Protection in the above referenced matter that is scheduled in front of Judge Robert Johnson tomorrow morning at 9:00a.m.

Kindly, please deliver these to Judge Johnson today.

Thank you.

Aneta Sniadala

Legal Assistant to Ilene B. Goldstein, Esq., Christopher D. Wehrman, Esq., Kyle M. Ruchim, Esq. and

FILED DATE: 12/22/2022 1:22 PM 2016D009534

 **Matt - OOP Petition Signed 12 21 22 EFILED.pdf**
1399K

 **Matt - OP Affidavit with Exhibits Signed 12 21 22 EFILED.pdf**
1067K

Megan Mason [REDACTED]

Thu, Dec 22, 2022 at 8:38 AM

To: "Diana Arroyo (Chief Judge's Office)" <Diana.Arroyo@cookcountyil.gov>
Cc: "CCC DomRelCR2108 (Chief Judge's Office)" <Ccc.Domrelcr2108@cookcountyil.gov>, "Cc: Christopher D. Wehrman" <CWehrman@kgwlaw.com>, Michael I Bender <mbender@caesarbenderlaw.com>, Aneta Sniadala <ASniadala@kgwlaw.com>

Dear Ms. Arroyo,

Thank you for your email. I apologize for any inconvenience that I may cause as a pro se litigant, but I hope that you can understand that I am anxious to be in compliance with court orders. I have received notice of hearing on this matter at 9am today, which is filed with the Clerk. Can you please provide confirmation that this matter will not be heard at 9am before Judge Johnson or another judge hearing cases on calendar 23. Rather, I understand from your note, this matter will be heard by Judge Pinzur-Rosenberg at 11:30am, on calendar 12. Any transfer order or explanation is appreciated. Confirmation by opposing counsel would also be greatly appreciated.

Kind Regards,
Megan Mason
[Quoted text hidden]

Diana Arroyo (Chief Judge's Office) <Diana.Arroyo@cookcountyil.gov>

Thu, Dec 22, 2022 at 8:55 AM

To: Megan Mason <megan42@gmail.com>
Cc: "CCC DomRelCR2108 (Chief Judge's Office)" <Ccc.Domrelcr2108@cookcountyil.gov>, "Cc: Christopher D. Wehrman" <CWehrman@kgwlaw.com>, Michael I Bender <mbender@caesarbenderlaw.com>, Aneta Sniadala <ASniadala@kgwlaw.com>

Good Morning, All,

Yes, this Petition will be heard today at 11:30am today by Judge Pinzur- Rosenberg.

Diana (Dee-ah-nah) Arroyo (She/Her/Ella)

Division Attorney, Domestic Relations

Circuit Court of Cook County

Richard J. Daley Center

[50 W. Washington](#), 1901D

Chicago, IL 60602

Main Office: (312) 603-5281

From: Megan Mason <[REDACTED]>

Sent: Thursday, December 22, 2022 8:39 AM

To: Diana Arroyo (Chief Judge's Office) <Diana.Arroyo@cookcountyil.gov>

Cc: CCC DomRelCR2108 (Chief Judge's Office) <Ccc.Domrelcr2108@cookcountyil.gov>; Cc: Christopher D. Wehrman <CWehrman@kgwlaw.com>; Michael I Bender <mbender@caesarbenderlaw.com>; Aneta Sniadala <ASniadala@kgwlaw.com>

Subject: Re: Emergency Matt 2016 D 9534- Emergency NOM & Petition for Emergency Order of Protection

[Quoted text hidden]

Christopher D. Wehrman <CWehrman@kgwlaw.com>

Thu, Dec 22, 2022 at 9:57 AM

To: "Diana Arroyo (Chief Judge's Office)" <Diana.Arroyo@cookcountyil.gov>, Megan Mason [REDACTED]
Cc: "CCC DomRelCR2108 (Chief Judge's Office)" <Ccc.Domrelcr2108@cookcountyil.gov>, Michael I Bender <mbender@caesarbenderlaw.com>, Aneta Sniadala <ASniadala@kgwlaw.com>, "peter@goedecke.com"

<peter@goedecke.com>

Ms. Arroyo:

Please be advised that we will not proceed with the hearing on the petition today, and will re-notice it to Judge Johnson's calendar when he returns.

Thank you for your assistance.

Chris

Christopher D. Wehrman

KATZ, GOLDSTEIN & WARREN

Chicago Office:

410 N. Michigan Ave., Suite 400

Chicago, IL 60611

Telephone: 847-317-9500

Facsimile: 847-317-0286

E-mail: cwehrman@kgwlaw.com

or visit our website at: <http://www.kgwlaw.com>

Lake County Office:

2345 Waukegan Road, Suite 150

Bannockburn, IL 60015



This message which contains information from a law firm, and any accompanying documents contain information that is confidential and privileged. If you have received this communication in error (you are not the addressee or authorized to receive this message for the addressee), you may not use, copy, or disclose the message or any information or accompanying documents contained in the message. Any dissemination, distribution or other use of the contents of this message by anyone other than the intended recipient is strictly prohibited. If you have received this message in error,

FILED DATE: 12/22/2022 1:22 PM 2016D009534

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.
Remote Court Date: No hearing scheduled

EXHIBIT C



Megan M [REDACTED]

12/22/2022 1:22 PM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2016D009534
Calendar, 23

**Automatic reply: Emergency Matt 2016 D 9534- Emergency NOM & Petition for
Emergency Order of Protection**

CCC DomRelCR2108 (Chief Judge's Office) <Ccc.Domrelcr2108@cookcountyl.gov>

20785539
Thu, Dec 22, 2022 at 8:39 AM

To: Megan Mason [REDACTED]

THANK YOU FOR YOUR EMAIL.

This email is assigned to Calendar 23, Judge Robert W. Johnson
Court Coordinator: Kaye Mason
Court Clerk: Gerese Colins
Zoom Meeting ID: 934 9022 2003 Password: 543296

**PLEASE NOTE:
CALENDAR 23 WILL BE CLOSED ON DECEMBER 20, 2022 THROUGH
JANUARY 2, 2023**

Judge Michael Forti (Cal. 61 room 3004) will be covering Emergency Motions for
Calendar 23. Kindly send Emergency email correspondence to

CCC.DomRelCR3004@cookcountyl.gov

Calendar 61 Zoom Meeting ID: 828 4953 7745 Password: 286646

FILED DATE: 12/22/2022 1:22 PM 2016D009534