

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

**PETER MATT’S RESPONSE TO PETITION FOR RELIEF
FROM JUDGMENT IN AUGUST 21, 2020 RULING OF CONTEMPT OF COURT**

1. PETER MATT states that the clear language contained within the statutes and Rules cited speak for themselves and denies attempts to paraphrase same. PETER MATT further denies that application of the statute here. PETER MATT admits there was a ruling made by this Court on August 21, 2020 and that the petition was served upon the parties, but denies the remaining allegations of fact contained in Paragraph 1.
2. PETER MATT denies the allegations contained in Paragraph 2 based on the exhibits attached to the petition.
3. PETER MATT denies the allegations contained in Paragraph 3 based on the exhibits attached to the petition.
4. PETER MATT states that the case law cited in Paragraph 4 speaks for itself and denies attempts to paraphrase same. PETER MATT further denies that the case law cited is applicable here. PETER MATT denies any factual allegations contained in Paragraph 4.

5. PETER MATT denies the allegations contained in Paragraph 5 based on the exhibits attached to the petition.
6. PETER MATT denies the allegations contained in Paragraph 6.
7. PETER MATT states that the clear language contained within the statute cited speaks for itself and denies attempts to paraphrase same. PETER MATT further denies that application of the statute here. PETER MATT denies the remaining allegations contained in Paragraph 7.
8. PETER MATT denies the allegations contained in Paragraph 8.
9. PETER MATT denies the allegations contained in Paragraph 9, further stating that an evidentiary hearing took place that included the testimony of both parties and that MEGAN MATT was represented by counsel during the hearing and presented her own case in chief.
10. PETER MATT admits there is a standard of proof in all hearings and trials, but denies the remaining allegations contained in Paragraph 10.
11. PETER MATT denies the allegations contained in Paragraph 11 based on the exhibits attached to the petition.
12. PETER MATT denies the allegations contained in Paragraph 12 based on the exhibits attached to the petition, except as identified below:
 - a. PETER MATT admits that his counsel filed a Petition for Rule to Show Cause alleging contempt of court and served same on MEGAN MATT through her counsel of record, but has insufficient information to be able to admit or deny the remaining allegations contained in Paragraph 12(a) and therefore demands strict proof thereof and denies same.

- b. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 12(b) and therefore demands strict proof thereof and denies same.
- c. PETER MATT admits that the March 20, 2020 court date was continued to April 21, 2020, but has insufficient information to be able to admit or deny the remaining allegations contained in Paragraph 12(c) and therefore demands strict proof thereof and denies same.
- d. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 12(d) and therefore demands strict proof thereof and denies same.
- e. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 12(e) and therefore demands strict proof thereof and denies same.
- f. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 12(f) and therefore demands strict proof thereof and denies same.
- g. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 12(g) and therefore demands strict proof thereof and denies same.
- h. PETER MATT admits that the court order of May 27,2020 speaks for itself, but denies attempts to paraphrase same, states that he has insufficient information to be able to admit or deny the remaining allegations contained in Paragraph 12(e) and therefore demands strict proof thereof and denies same.

- i. PETER MATT states that the court docket speaks for itself and denies attempts to paraphrase same, and has insufficient information to be able to admit or deny the allegations contained in Paragraph 12(i) and therefore demands strict proof thereof and denies same.
- j. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 12(j) and therefore demands strict proof thereof.
- k. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 12(k) and therefore demands strict proof thereof and denies same.
- l. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 12(l) and therefore demands strict proof thereof and denies same.
- m. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 12(g) and therefore demands strict proof thereof and denies same.
- n. PETER MATT states that the court record of court dates speak for themselves and denies attempts to paraphrase same and states that he has insufficient information to be able to admit or deny the allegations contained in Paragraph 12(n) and therefore demands strict proof thereof and denies same.
- o. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 12(o) and therefore demands strict proof thereof and denies same.

- p. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 12(p) and therefore demand strict proof thereof and denies same.
- q. PETER MATT denies that the Petition for Rule to Show Cause failed to allege action that constituted MEGAN MATT's violation of court order and corresponding contempt of court, and states that he has insufficient information to be able to admit or deny the remaining allegations contained in Paragraph 12(q) and therefore demands strict proof thereof and denies same.
- r. PETER MATT states that the Petition for Rule to Show Cause speaks for itself and denies to paraphrase same, denies that the Petition for Rule to Show Cause failed to allege facts or evidence, denies that Attorney Trowbridge said very little and failed to offer a defense, and denies that no specific allegation of contempt was made, and has insufficient information to be able to admit or deny the remaining contained in Paragraph 12(r) and therefore demands strict proof thereof and denies same.
- s. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 12(s) and therefore demands strict proof thereof and denies same.
- t. PETER MATT admits that Attorney Trowbridge withdrew as MEGAN MATT's counsel, but has insufficient information to be able to admit or deny the remaining allegations contained in Paragraph 12(t) and therefore demands strict proof thereof and denies same.

- u. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 12(u) and therefore demands strict proof thereof and denies same.
 - v. PETER MATT admits that his counsel's does not work for MEGAN MATT nor is it appropriate for MEGAN MATT to make demands on his counsel and staff for public records or any other demands made by MEGAN MATT, and has insufficient information to be able to admit or deny the remaining allegations contained in Paragraph 12(v) and therefore demands strict proof thereof and denies same.
 - w. PETER MATT denies the allegations contained in Paragraph 12(w).
13. PETER MATT denies the allegations contained in Paragraph 13 based on the exhibits attached to the petition, except as identified below:
- a. PETER MATT admits that there were court dates as identified on the court docket and consistent with the court orders entered in this cause, but has insufficient information to be able to admit or deny the allegations contained in Paragraph 13(a) and therefore demands strict proof thereof and denies same.
 - b. PETER MATT denies that fraud was committed in this case, but has insufficient information to be able to admit or deny the remaining allegations contained in Paragraph 13(b) and therefore demands strict proof thereof and denies same.
 - c. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 13(c) and therefore demands strict proof thereof and denies same.

- d. PETER MATT states that the docket entry speaks for itself and denies attempts to paraphrase same, and states that he has insufficient information to be able to admit or deny the remaining allegations contained in Paragraph 13(d) and therefore demands strict proof thereof and denies same.
 - e. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 13(e) and therefore demands strict proof thereof and denies same.
14. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 14 and therefore demands strict proof thereof and denies same.
15. PETER MATT denies the allegations related to Christopher Wehrman and states he has insufficient information to be able to admit or deny the allegations contained in Paragraph 15 and therefore demands strict proof thereof and denies same, except as follows:
- a. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 15(a) and therefore demands strict proof thereof and denies same.
 - b. PETER MATT admits that MEGAN MATT filed a motion on November 24, 2020 as alleged in Paragraph 15(b) with false and inaccurate allegations, states that the motion speaks for itself and denies attempts to paraphrase same, and denies the remaining allegations contained in Paragraph 15(b).
 - c. PETER MATT admits that a subpoena was filed and served on counsel for PETER MATT, but denies the remaining allegations contained in Paragraph 15(c).

- d. PETER MATT admits that a motion to quash was filed related to MEGAN MATT's subpoena, but denies the remaining allegations contained in Paragraph 15(d).
 - e. PETER MATT states that the court file speaks for itself and denies attempts to paraphrase same, and denies the remaining allegations contained in Paragraph 15(e).
 - f. PETER MATT states that the court file speaks for itself and denies attempts to paraphrase same, but denies the remaining allegations contained in Paragraph 15(f).
 - g. PETER MATT states that the court file speaks for itself and denies attempts to paraphrase same, and denies the remaining allegations contained in Paragraph 15(g).
 - h. PETER MATT denies the allegations contained in Paragraph 15(f).
 - i. PETER MATT denies the allegations contained in Paragraph 15(l).
16. PETER MATT denies the allegations contained in Paragraph 16, except as follows:
- a. PETER MATT states that the August 20, 2020 order speaks for itself and denies attempts to paraphrase same, and denies the remaining allegations contained in Paragraph 16(a).
 - b. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 16(b) and therefore demands strict proof thereof and denies same.

- c. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 16(c) and therefore demands strict proof thereof and denies same.
- d. PETER MATT denies the allegations contained in Paragraph 16(d).
- e. PETER MATT admits that MEGAN MATT has made various requests for information through the case without the formal requirements of the Illinois Rules of Civil Procedure or the Illinois Supreme Court Rules, denies that there are remaining emails, and has insufficient information to be able to admit or deny the allegations contained in Paragraph 16(e) and therefore demands strict proof thereof and denies same.
- f. PETER MATT admits that MEGAN MATT issued a subpoena to his counsel for which a motion to quash is pending, but has insufficient information to be able to admit or deny the allegations contained in Paragraph 16(f) and therefore demands strict proof thereof and denies same
- g. PETER MATT admits that the case was called before Judge Johnson on March 2, 2022, further stating that the case was returned to Judge Johnson after MEGAN MATT's Motion for Substitution of Judge for Cause was heard and denied after argument on same, but denies the remaining allegations contained in Paragraph 16(g).
- h. PETER MATT states that the case law cited in Paragraph 16(h) speaks for itself and denies attempts to paraphrase same and further states that the case law cited is not applicable herein. PETER MATT denies the remaining allegations contained in Paragraph 16(h).

- i. PETER MATT admits that he has not tendered any documents to MEGAN MATT outside of his responses to the pleadings, responses to discovery, and submission of exhibits at the numerous evidentiary hearings before multiple judges, but has insufficient information to be able to admit or deny the allegations contained in Paragraph 16(i) and therefore demands strict proof thereof and denies same
17. PETER MATT denies the allegations contained in Paragraph 17, except as identified below:
- a. PETER MATT admits that he requested a meeting with MEGAN MATT and the parenting coordinator in May, 2021, but denies the characterization of the reason for the meeting and denies the remaining allegations contained in Paragraph 17(a).
 - b. PETER MATT admits there were discussions regarding Angus and employment opportunities, but denies the remaining allegations contained in Paragraph 17(b).
 - c. PETER MATT admits that he wrote an email and states that the email speaks for itself and denies attempts to paraphrase same, but denies the remaining allegations contained in Paragraph 17(c).
 - d. PETER MATT admits that he submitted a business plan and states that the business plan speaks for itself and denies attempts to paraphrase same, but denies the remaining allegations contained in Paragraph 17(d).
 - e. PETER MATT admits that MEGAN MATT has alleged fraud, but denies there is any action for intervention, and denies the remaining allegations contained in Paragraph 17(e).
 - f. PETER MATT admits that orders have been entered against MEGAN MATT due

to her behavior, abuse of the children, and abuse of PETER MATT as more fully identified in this Court's orders and findings, but denies the remaining allegations contained in Paragraph 17(f).

18. PETER MATT denies the allegations contained in Paragraph 18.
19. PETER MATT admits that MEGAN MATT is a lay person and, based on the appearance by Attorney Trowbridge, retained him as counsel. PETER MATT denies the remaining allegations contained in Paragraph 19.
20. PETER MATT denies the allegations contained in Paragraph 20, except as identified below:
 - a. PETER MATT denies the allegations contained in Paragraph 20(a).
 - b. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 20(b) and therefore demands strict proof thereof and denies same.
 - c. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 20(c) and therefore demands strict proof thereof and denies same.
 - d. PETER MATT admits that Attorney Trowbridge withdrew as counsel and that PETER MATT did not receive a motion to reconsider, but has insufficient information to be able to admit or deny the allegations contained in Paragraph 20(d) and therefore demands strict proof thereof and denies same.
19. (sic) PETER MATT denies the allegations contained in Paragraph 19 (sic).
20. (sic) PETER MATT denies the allegations contained in Paragraph 20 (sic), except as identified below:

- a. PETER MATT denies there have been any criminal actions in this cause, and has insufficient information to be able to admit or deny the remaining allegations contained in Paragraph 20(a) and therefore demands strict proof thereof and denies same.
 - b. PETER MATT admits the allegations contained in Paragraph 20(b), and further states that separate judges held hearings on each of MEGAN MATT's motions for substitution of judge for cause, and both motions were denied.
 - c. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 20(c) and therefore demands strict proof thereof and denies same.
 - d. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 20(d) and therefore demands strict proof thereof and denies same.
 - e. PETER MATT has insufficient information to be able to admit or deny the allegations contained in Paragraph 20(e) and therefore demands strict proof thereof and denies same.
 - f. PETER MATT denies that MEGAN MATT is under duress or fear of Judge Johnson or that the Court has acted in retaliation for her behavior, but has insufficient information to be able to admit or deny the remaining allegations contained in Paragraph 20(f) and therefore demands strict proof thereof and denies same.
21. PETER MATT denies there is or has been any fraud perpetrated in this Court, and further denies the remaining allegations contained in Paragraph 21.

FILED DATE: 2/15/2023 10:35 AM 2016D009534

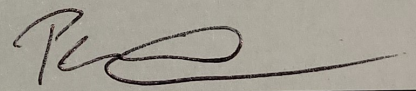
WHEREFORE, the Petitioner, PETER MATT respectfully requests that MEGAN MATT's petition be denied and that an order reimbursing PETER MATT for attorney's fees and costs defending this motion be awarded in favor of PETER MATT and against MEGAN MATT.

Respectfully submitted,

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

Christopher D. Wehrman (cwehrman@kgwlaw.com)
Katz, Goldstein & Warren
410 N. Michigan Ave., Ste. 400
Chicago, Illinois 60611
(847) 317-9500
Service accepted at: pleadings@kgwlaw.com
#35921