Remote Court Date: No hearing scheduled

2016D009534
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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS COUNTY DEPARTMENT, DOMESTIC RELATIONS DIVISION

FILED
2/27/2023 9:42 AM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, II
2016D009534
Calendar, 23
21628743

IN RE THE MARRIAGE OF:	)
PETER MATT,	)
Petitioner,	)
and	) No. 16 D 9534
MEGAN MATT n/k/a MASON,	)
Respondent.	)

# RESPONSE TO PETER MATT'S RESPONSE TO MEGAN MASON'S SECTION 2-1401 PETITION FOR RELIEF FROM JUDGMENT IN AUGUST 21, 2020 RULING OF CONTEMPT OF COURT

I, Megan Mason, respondent pro se in case 2016 D 9534 present this response to Petitioner Peter Matt's response to Megan Mason's Section 2-1401 Petition For Relief from Judgment in August 21, 2020 Ruling of Contempt of Court. Although petitioner has responded with an omnibus denial of all claims in the Section 2-1401 Petition I served upon him, he has provided no evidence and stated no basis to dispute any of the facts described, to question the applicability of Rule 735 ILCS 5/2-1401 to the matter before this court, or to raise any controversy as to jurisdiction of this court in this matter. Therefore I maintain all claims and arguments in my original petition and ask this court to assume my claims are true having received no disputes based in fact.

Nevertheless, in response to petitioner's request for further proof on many of these claims I submit to this court additional exhibits as detailed below, interrogatories and requests for documents, as well as a list of lay witnesses who may more fully substantiate my claims before this court. Specifically I submit the following exhibit: Exhibit M Docket Case 2016D9534 as of

June 8, 2021. On June 8, 2021 I created a pdf of the full docket for case 2016 D 9534 and generated the Exhibit M now presented with this response. Unless Mr. Matt wishes to make the outlandish claim that Clerk Iris Martinez has somehow allowed for modifications or changes to the official docket in this case, I assume there can be no question as to the legitimacy of the records as presented in Exhibit M. I also submit the following interrogatory sent to petitioner Peter Matt: Interrogatory Peter Matt February 27, 2023

And I submit the following list of individuals I have called to testify as lay witnesses to the court regarding the facts that support my claim of acting under fraud and duress and lay witnesses who will testify as to evidence previously unknown to the court in support of my underlying claim under Section 2-1401:

Robert Johnson, I submit a copy here of the subpoena sent to Judge Johnson (Exhibit N Johnson Subpoena)

Bradley Trowbridge, I submit a copy here of the subpoena sent to Judge Trowbridge (Exhibit O); Kaye Mason, I submit a copy here of the subpoena sent to Ms. Mason (Exhibit P)

Michael Bender, I submit a copy here of the subpoena sent to Mr. Bender (Exhibit Q)

Johnathan Palen, I submit a copy here of the subpoena sent to Dr. Palen (Exhibit R).

Please note, because Dr. Palen has been in use of a fraudulent mailing address for at least two years and is still using a fraudulent mailing address in his contact information maintained by The Domestic Relations Division of The Circuit Court of Cook County I am unable to mail him documents. Having contacted Dr. Palen multiple times to request his mailing information without success, I have mailed the subpoena to Presiding Judge Regina Scannicchio to deliver to Dr. Palen who still serves at her discretion as a court approved custody evaluator and parenting coordinator.

Christopher Wehrman, I submit a copy here of the subpoena sent to Mr. Wehrman (Exhibit S)

In response to some specific requests for further evidence made by Petitioner Peter Matt I clarify and supplement as follows:

 Peter Matt states, "states that the clear language contained within the statutes and Rules cited speak for themself". I agree. I state here the statute in full:

> "(735 ILCS 5/2-1401) (from Ch. 110, par. 2-1401) Sec. 2-1401. Relief from judgments.

- (a) Relief from final orders and judgments, after 30 days from the entry thereof, may be had upon petition as provided in this Section. Writs of error coram nobis and coram vobis, bills of review, and bills in the nature of bills of review are abolished. All relief heretofore obtainable and the grounds for such relief heretofore available, whether by any of the foregoing remedies or otherwise, shall be available in every case, by proceedings hereunder, regardless of the nature of the order or judgment from which relief is sought or of the proceedings in which it was entered. Except as provided in the Illinois Parentage Act of 2015, there shall be no distinction between actions and other proceedings, statutory or otherwise, as to availability of relief, grounds for relief, or the relief obtainable.
- (b) The petition must be filed in the same proceeding in which the order or judgment was entered but is not a continuation thereof. The petition must be supported by an affidavit or other appropriate showing as to matters not of record. A petition to reopen a foreclosure proceeding must include as parties to the petition, but is not limited to, all parties in the original action in addition to the current record title holders of the property, current occupants, and any individual or entity that had a recorded interest in the property before the filing of the petition. All parties to the petition shall be notified as provided by rule.

  (b-5) A movant may present a meritorious claim under this Section if the allegations in the petition establish each of the following by a preponderance of the evidence:
  - (1) the movant was convicted of a forcible felony;
- (2) the movant's participation in the offense was related to him or her previously having been a victim of domestic violence as perpetrated by an intimate partner;
- (3) no evidence of domestic violence against the movant was presented at the movant's sentencing hearing;
- (4) the movant was unaware of the mitigating nature of the evidence of the domestic violence at the time of sentencing and could not have learned of its significance sooner through diligence; and
- (5) the new evidence of domestic violence against the movant is material and noncumulative to other evidence offered at the sentencing hearing, and is of such a conclusive character that it would likely change the sentence imposed by the original trial court.

Nothing in this subsection (b-5) shall prevent a movant from applying for any other relief under this Section or any other law otherwise available to him or her. As used in this subsection (b-5):

"Domestic violence" means abuse as defined in Section 103 of the Illinois Domestic Violence Act of 1986.

"Forcible felony" has the meaning ascribed to the term in Section 2-8 of the Criminal Code of 2012.

"Intimate partner" means a spouse or former spouse, persons who have or allegedly have had a child in common, or persons who have or have had a dating or engagement relationship.

- (b-10) A movant may present a meritorious claim under this Section if the allegations in the petition establish each of the following by a preponderance of the evidence:
  - (A) she was convicted of a forcible felony;
- (B) her participation in the offense was a direct result of her suffering from post-partum depression or post-partum psychosis;
- (C) no evidence of post-partum depression of post-partum psychosis was presented by a qualified medical person at trial or sentencing, or both;
- (D) she was unaware of the mitigating nature of the evidence or, if aware, was at the time unable to present this defense due to suffering from post-partum depression or post-partum psychosis, or, at the time of trial or sentencing, neither was a recognized mental illness and as such, she was unable to receive proper treatment; and
- (E) evidence of post-partum depression or post-partum psychosis as suffered by the person is material and noncumulative to other evidence offered at the time of trial or sentencing, and it is of such a conclusive character that it would likely change the sentence imposed by the original court.

Nothing in this subsection (b-10) prevents a person from applying for any other relief under this Article or any other law otherwise available to her.

As used in this subsection (b-10):

"Post-partum depression" means a mood disorder which strikes many women during and after pregnancy and usually occurs during pregnancy and up to 12 months after delivery. This depression can include anxiety disorders.

"Post-partum psychosis" means an extreme form of post-partum depression which can occur during pregnancy and up to 12 months after delivery. This can include losing touch with reality, distorted thinking, delusions, auditory and visual hallucinations, paranoia, hyperactivity and rapid speech, or mania.

(c) Except as provided in Section 20b of the Adoption Act and Section 2-32 of the Juvenile Court Act of 1987, in a petition based upon Section 116-3 of the Code of Criminal Procedure of 1963 or subsection (b-10) of this Section, or in a motion to vacate and expunge convictions under the Cannabis Control Act as provided by subsection (i) of Section 5.2 of the Criminal Identification Act, the petition must be filed not later than 2 years after the entry of the order or judgment. Time during which the person seeking relief is under legal disability or duress or the ground for relief is fraudulently concealed shall be excluded in computing the period of 2 years."

I maintain that the clear language of this statute does indeed state that this action may be brought in this court.

In Peter Matt's response he asserted that there are questions of fact raised in paragraph 1 of my petition. There are not. In paragraph 1 I assert jurisdiction under this statute. I assert that paragraph C, quoted in entirety above and the relevant points restated here: "Time during which the person seeking relief is under legal disability or duress or the ground for relief is fraudulently concealed shall be excluded in computing the period of 2 years." This court has jurisdiction to hear my petition and to consider through trial of fact whether I was and am acting under fraud or duress. Petitioner Peter Matt having raised no statutory objections, I maintain my right to a hearing on this matter.

- 2. Peter Matt denies the allegations of fraud stated in paragraph 2 of my petition but has presented no evidence, facts or evidence to support his denial and I maintain that my claims that Bradley Trowbridge defrauded me are true and supported by evidence. I maintain that the evidence I have previously submitted is sufficient to prove that Bradley Trowbridge defrauded me by purporting to act as my attorney. In further support of my claim, I have called Bradley Trowbridge, Michael Bender, Christopher Wehrman, Robert Johnson, Peter Matt and Kaye Mason as lay witnesses to Mr. Trowbridge's fraud. I have further called upon Peter Matt and his counsel, Christopher Wherman, to tender to me a copy of the email Mr. Wehrman attested under penalty of perjury to have sent to Mr. Trowbridge on March 10, 2020, at which time Mr. Trowbridge was served on my behalf with a Petition for Rule to Show Cause.
- 3. Peter Matt denies the allegations of fraud stated in paragraph 3 of my petition but has presented no evidence, facts or evidence to support his denial and I maintain that my claims that Bradley Trowbridge defrauded me are true and supported by evidence. In further support of my claim I have called Robert Johnson and Kaye Mason as lay witnesses to an online action on July 21, 2020 at which time a fraudulent order was

entered claiming I, Megan Mason, had moved the court to allow me to file a pro se appearance. As Mr. Johnson and Ms. Mason will testify under oath and I have previously attested under affidavit, I had no contact with these parties personally or by way of counsel between March, 2020 and August, 2020 so this order was entered fraudulently. I reference p. 46 and p. 47 of the newly submitted Exhibit M Docket Case 2016 D 9534 as of June 8, 2021. I state here under penalty of perjury that I personally printed this pdf copy of the docket on June 8, 2021and can attest that this is how the docket appeared on that date. In the same way Bradley Trowbridge has been called as a witness and will testify under perjury that he did not inform me of a Petition for Rule to Show Cause served upon him on my behalf on March 10, 2020. In further support of this claim I reference p.43-3-49 Of Exhibit M Docket Case 2016 D 9534 as of June 8, 2021.

- 4. Peter Matt has denied without specific basis the applicable case law in determining whether or not I was acting under duress in the period subsequent to Bradley Trowbridge's first known acts of fraud. I restate that, "In 1962 the Illinois Supreme Court defined duress as "a condition where one is induced by a wrongful act or threat of another to make a contract under circumstances which deprive [the individual] of the exercise of free will." Kaplan v. Kaplan, 25 Ill. 2d 181, 185, 182 N.E.2d 706, 708 (1962).
- 5. I maintain that fraud by Bradley Trowbridge has been abundantly established on a prima facie basis in the evidence submitted with my petition and, due to Mr. Trowbridge's role as my alleged legal advocate, any action I took while under the influence of his fraud was made under duress and any contract or legal act perpetrated by Mr. Trowbridge or myself under such duress is rendered void.
- 6. I maintain that Robert Johnson and Kaye Mason, personally, entered a fraudulent order on July 21, 2020 falsely attesting that I had moved the court to appear pro se. This is

- supported by Exhibit M, my affidavit and testimony and the testimony of Robert Johnson and Kaye Mason. I maintain that any act subsequent to this fraud is rendered void due to the obvious bias of a trial judge who has defrauded a litigant as well as the unquestionable duress this places on that litigant.
- 7. I agree with Peter Matt that the clear language of (735 ILCS 5/2-1401) (from Ch. 110, par. 2-1401) speaks for itself and allows an action to be brought more than two years after the events, " *Time during which the person seeking relief is under legal disability or duress or the ground for relief is fraudulently concealed shall be excluded in computing the period of 2 years.*"
- 8. I maintain my assertion that Robert Johnson continues to act as trial judge subsequent to known acts of fraud and restate my assertion that I will not be free from duress in this court until such time as any party who has committed documented acts of fraud against me are removed from involvement in my case.
- 9. Respondent denies that she presented or was required to present a case in chief on August 21, 2020. Respondent reminds this court that Petitioner had alleged I was in contempt of court by filing a petition for rule to show cause on March 10, 2020. Respondent reminds this court that in matters of contempt of court the burden is on the filer, in this case petitioner Peter Matt, to prove contempt of court. As stated in In re Marriage of Knoll, 2016 IL App (1st) 152494, ¶ 50, 65 N.E.: "The burden initially falls on the petitioner to establish, by a preponderance of the evidence, that the alleged contemnor has violated a court order." I repeat my request that Mr. Matt disclose any facts or evidence presented to the court to demonstrate contempt of court because I can find none and know of none.

- 10. Respondent maintains that she could not have presented a meritorious defense while under the coercive authority of fraudulent counsel and trial judge and asserts that the obvious disadvantage of being represented by an attorney who is defrauding you while purporting to offer zealous representation is almost too obvious to put in writing. Respondent maintains that the only more obvious meritorious claim to a defense would be a trial judge who has entered fraudulent orders intended to damage your ability to mount a legal defense, as is also the case here.
- 11. I maintain Bradley Trowbridge engaged in multiple acts to orchestrate a false ruling of contempt of court against me, thereby preventing me from presenting a meritorious defense against the claim because I believed Mr. Trowbridge was my advocate, not my adversary.
- 12. Mr. Matt has bizarrely asserted an ignorance to matters that are obviously within his and his attorney's understanding.
  - According to his response, "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." Obviously Mr. Matt's attorney, who filed this response, Christopher Wehrman does have the ability to verify that he sent an email on March 10, 2020. Obviously Mr. Wehrman signed his name and attested under penalty of perjury to having sent the email. I have issued a subpoena to Mr. Wehrman to provide the email with which he served Mr. Trowbridge and ask him to not obfuscate unnecessarily.

- b. Peter Matt has demanded proof that Mr. Trowbridge received electronic notice. I present Exhibit M Docket Case 2016D9534 as of June 8, 2021, p. 43-48. I further call on Mr. Trowbridge to testify and to tender emails during this time received from the court by Mr. Trowbridge on my behalf.
- c. Exhibit M is again presented as evidence that Mr. Trowbridge received electronic notice.
- d. Exhibit D is self evident, it is a dated invoice from Mr. Trowbridge.
- Exhibit M is again presented as evidence that Mr. Trowbridge received electronic notice.
- f. Exhibit F is self evident and I assert under penalty of perjury that it is an email from me to Mr. Trowbridge.
- g. Exhibit G is self evident and I assert under penalty of perjury that it is an email that was sent from the email address Mr. Trowbridge used to communicate with me while his client, it contains Mr. Trowbridge's email signature, and I believe the email came from him. In further support of this claim Mr. Trowbridge is called to testify.
- Exhibit M is again presented as evidence that Mr. Trowbridge received electronic notice.
- Peter Matt refers to the docket as self evident. I do as well, referencing exhibit M
   p. 46, which dockets an order by Judge Robert Johnson on July 21, 2020 allowing
   a pro se appearance which I maintain was fraudulent and not requested by me.
- j. Exhibit E is self evident and Mr. Bender did bill me for a court appearance.

- k. I maintain that Exhibit E is self evidence, supported further by my affidavit and will be further supported by Mr. Trowbridge's testimony. I did not know about scheduled court dates or an allegation of contempt of court on July 12, 2020.
- Exhibit E is self evident and I maintain that Mr. Trowbridge further concealed an allegation of contempt of court through a fraudulent act in the form of an email he sent me on July 13, 2020.
- I maintain Brad Trowbridge had not informed me of a Petition for Rule to Show
   Cause on July 13, 2020. I reference my affidavit and the testimony of Bradley
   Trowbridge and myself.
- n. I maintain that the evidence submitted, including my own testimony under affidavit, support my claim that I did not know on July 20, 2020 there was a status hearing related to an allegation of contempt of court, I maintain that I believed it was simply a time for Michael Bender to withdraw due to the absence of any action before the court.
- o. Exhibit F is self evident and I maintain I wrote to Bradley Trowbridge to ask if anything had been filed against me.
- p. Exhibit B is self evident and I maintain I did not receive any exhibits in support of a claim I was in contempt of court, this will be further supported by the testimony of Bradley Trowbridge.
- q. I still maintain that petitioner failed to state a claim of violation of court order or present evidence and demand proof that Mr. Matt had a claim of contempt of court supported by facts and evidence.

- I maintain that I did not believe a ruling of contempt of court was possible under Illinois law. I maintain the ruling of contempt of court entered by Robert Johnson was not based on Illinois law and due to the fraud in its orchestration, is void.

  Peter Matt claims the Petition for Rule to Show Cause speaks for itself and I only agree to the extent that it contained the label "Petition for Rule to Show Cause", I demand proof that Mr. Matt met the standard of law for such a petition to prevail.
- s. I submit my testimony and that of Mr. Trowbridge to support my claim that I asked Mr. Trowbridge to appeal the ruling and he told me that he would file a motion to reconsider but failed to do so.
- t. I maintain the facts are self evident and supported by the public record, including the docket Exhibit M.
- I call Mr. Trowbridge to support my testimony that he refuses to provide me the
  emails and the proof of service with which he received a Petition for Rule to
  Show Cause in my stead on March 10, 2020.
- Wr. Mr. Matt further obfuscastes by failing to present the email by which he served Mr. Trowbridge a PRTSC on March 10, 2020 and obfuscates by demanding the proof he possesses and engaging in a philosophical musing on employment. I urge Mr. Wehrman to simply provide the email he testified under penalty of perjury to having sent. Mr. Wherman is also called as a witness to testify that he sent Mr. Trowbridge an email on March 10, 2020.
- w. I have documented at least eight specific acts of fraud by Mr. Trowbridge, it is enough to say that it was willful and malicious, not coincidence or incompetence.

- 13. Without presenting any evidence, Mr. Matt has denied my claim that Robert Johnson entered an order allowing a fraudulent pro se appearance in my stead. Court employees Robert Johnson and Kaye Mason are called as witnesses, my affidavit clearly states and I will testify under oath that I had no contact with them or communication at this time. Mr. Trowbridge is also called as a witness. All are witness to the fact that this entry was made secretly without my awareness.
- 14. I maintain that Robert Johnson in the role of trial judge has continued to commit crimes against me in retaliation for my testimony against him and my disclosure of his involvement in corruption.
- 15. I maintain that Robert Johnson has been shown for years that Mr. Matt is a financial criminal who engages in financial exploitation, tax evasion and money laundering within his actions in this court, in the course of his business, and in his actions toward our minor children. I maintain that Robert Johnson's tolerance of such federal crimes now constitutes conspiracy in those acts.
- 16. I maintain that the solicitation of bribery made by court appointee John Palen and the participation of Robert Johnson in those criminal acts are well documented in the exhibits filed and will further be supported by my own testimony and the testimony of John Palen, Robert Johnson, Kaye Mason, Michael Bender and Christopher Wherman.
- 17. I maintain that Mr. Matt's schemes to exploit and steal from our son A with the support of court appointee John Palen is well documented with my petition. I maintain that Robert Johnson, in the role of trial judge, has further conspired in these acts by failing to act to stop obvious child abuse and exploitation of a minor child and by allowing the court's resources to be used in furtherance of these schemes. This claim will

- further be supported by my own testimony and the testimony of John Palen, Robert Johnson, Kaye Mason, Michael Bender, Peter Matt and Christopher Wherman.
- 18. I maintain that acts by an individual acting as a trial judge subsequent to obvious fraud are void. I maintain that I have demonstrated Robert Johnson's participation in acts of fraud since at least July 21, 2020 and any acts subsequent to this are rendered void.
- 19. I maintain that the presence of duress in my case are well documented here and obvious.
- 20. I maintain that I exercised due diligence as supported by abundant evidence.
- 21. I maintain that I exercised due diligence in filing this Section 2-1401 petition.
- 21. sic I maintain that any fraud by a trial judge renders every action void.

### WHEREFORE I ask that this court:

- A. Vacate the August 21, 2020 finding of contempt against me, Megan Mason, entered in this court.
- B. Vacate all rulings issued in this case by Judge Robert Johnson subsequent to the August21, 2020 finding of contempt.
- C. Vacate all rulings issued in this case by Judge Robert Johnson prior to the August 21, 2020 finding of contempt.
- D. The basis of any fees ordered in this case subsequent to the appearance of Robert Johnson having been vacated, that all parties to whom Robert Johnson has ordered fees paid by Megan Mason be ordered to remit payment to Megan Mason in the amount of fees paid plus 3% annual interest, those fees having been fraudulently ordered. This includes but is not limited to:
  - All fees paid by Megan Mason to Michael Bender in the form of Guardian Ad Litem fees.

- 2. All fees paid by Megan Mason to Chrstopher Wehrman in the form of sanctions and court ordered attorneys' fees.
- 3. All fees paid by Megan Mason to Gerald Blechman in the form of custodyevaluator fees.
- 4. All fees paid by Megan Mason to Jonathan Palen in the form of parent coordinator fees.
- 5. That Bradley Trowbridge be ordered to remit payment to Megan Mason in the amount of all fees paid to him, those fees having been fraudulently obtained, plus 3% annualized interest.

E. Any other relief that the court deems fit.

Respectfully Submitted By,

Megan Mason

Respondent Pro Se

Remote Court Date: No hearing scheduled

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS IRIS Y. MARTINEZ COUNTY DEPARTMENT, DOMESTIC RELATIONS DIVISION COUNTY.

**FILED** 

2/27/2023 9:42 AM

COUNTY DEPARTMENT,	DOMESTIC RELATIONS DIVISION CO	
IN RE THE FORMER MARRIAGE OF:	) Ca	16D009534 lendar, 23 628743
PETER MATT,	)	020143
Petitioner,	) Case No. 2016 D 009534	
and	)	
MEGAN MATT, n/k/a MEGAN MASON,	)	
Respondent.	)	
Kesponaeni.	)	

RULE 213 INTERROGATORY FOR PETER MATT REGARDING MEGAN MASON'S SECTION 2-1401 PETITION FOR RELIEF FROM JUDGMENT IN AUGUST 21, 2022 FINDING OF CONTEMPT OF COURT

Under Illinois Rule 213 I, Megan Mason, respondent pro se in case 2016 D 9534 and filer of the Section 2-1401 Petition before this court, serve the following interrogatories and request to produce documents on Peter Matt, petitioner in this case. Under Rule 213 I require a response to these questions within 28 days of service.

1. On March 10, 2020, your attorney Christopher Wehrman attested under penalty of perjury to having emailed a copy of a Petition for Rule to Show Cause you filed on that same date to attorney Bradley Trowbridge. Did Mr. Trowbridge confirm receipt of this petition by, for example, emailing back to say that he received it or calling Mr. Wehrman to say, "I received your petition?". I ask for any and all supporting documentation in your possession, including the email Mr. Wehrman attested to sending on March 10, 2020.

2. If Mr. Trowbridge confirmed receipt of the Petition for Rule to Show Cause filed on March 10, 2020, by what means did he confirm receipt? On what time and date did he do so? I ask for documents in your possession to confirm these details.

3.	On March 10, 2020 when you filed a petition for rule to show cause, did you submit any
	evidence in support of your claim, other than the marital settlement agreement and
	allocation judgment parenting plan incorporated by reference? If you filed any evidence,
	I ask for the stamped version of any exhibits you claim to have presented in support of
	this petition.

4. Between March 8, 2020 and July 20, 2020 did you have any communications with counsel for Megan Mason or with Megan Mason directly related to an allegation of contempt of court or the petition for rule to show cause you filed on March 10, 2020? I ask for a copy of any and all emails to and from Mr. Trowbridge during the course of this case.

5. If you did communicate with Mr. Trowbridge during this period, by what means did you do so and on what dates?

6. According to the docket for case 2016 D 9534, on July 6, 2020 at 9am you attended a status call. Were you, Peter Matt present? Was your attorney, Christopher Wherman, present?

7.	At the July 6, 2020 status call was Michael Bender present?
8.	At the July 6, 2020 status call was Bradley Trowbridge present?
9.	If Mr. Trowbridge was present at the July 6, 2020 status hearing, did he claim to represent Megan Mason at this time?
10.	If Mr. Trowbridge was not present at the July 6, 2020 status hearing, did you make any effort by counsel to reach him? For example, did Mr. Wehrman call Mr. Trowbridge? Did Mr. Wehrman email Mr. Trowbridge? I ask for any and all documentary evidence of such communication, such as emails or phone records.
11.	According to the docket for case 2016 D 9534, on July 21, 2020 at 3pm you attended a status call. Were you, Peter Matt present? Was your attorney, Christopher Wherman, present?
12.	At this hearing were you presented with a motion for leave to file an appearance on behalf of Megan Mason? Did any party state to the court that Megan Mason wished to

file a pro se appearance at this time? I ask for any and all documents in your possession related to this order.

13. Other than the official appointments as recorded in the docket for case 2016 D 9534 do you have any business or legal relationships with any of the following individuals: Michael Bender, Gerald Blechman, Jonathan Palen, Christopher Wehrman, Robert Johnson, Kaye Mason or Bradley Trowbridge? Please disclose any relationship not recorded in the official docket including, but not limited to: partnerships in any trust or business entity owned by you or the children, any role as trustee or guardian to either of the minor children, any shared business ownership in The United States of America or abroad, or any other contractual, financial or legal relationship in the past, present or promised in the future. I ask for any and all contracts, written agreements or proposals related to any outside business or legal interests with parties involved as court appointees or attorneys in this case.

Respectfully Submitted By,

Megan Mason

Remote Court Date: No hearing scheduled

# FILED DATE: 2/27/2023 9:42 AM 2016D009534

# **Exhibit N**

FILED 2/27/2023 9:42 AM IRIS Y. MARTINEZ CIRCUIT CLERK COOK COUNTY, IL 2016D009534 Calendar, 23 21628743

Subpoena in a Civil Matter (For Testimony and/or Documents)

(12/01/20) CCG 0106 A

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IN THE CIRCUIT COURT OF COOK COUNTY, ILLI	NOIS
Peter Matt	
Plaintiff/Petitioner v. Case No. 2016 D 9534	
Megan Matt (NKA Megan Mason)	
Defendant/Respondent	
SUBPOENA IN A CIVIL MATTER  (For Testimony and/or Documents)  To: Judge Robert Johnson, Personally As Lay Witness to Events and Facts Relation 50 W. Washington St., Rm. 2108 Chicago, Illinois 60602	ted to Section 2-1401 Petition
1. ✓ YOU ARE COMMANDED to appear to give your testimony before the  Honorable Judge Presiding TBD in Room 2108  The Circuit Court of Cook County Daley Center , Illinois on Mat 1:00	May 2 fore a Notary Public
at:	

 $oldsymbol{\boxtimes}$  Description continued on attached page(s).

## **Exhibit N**

Subpoena Robert Johnson for Hearing On Section 2-1401 Petition

- All emails in your possession related to case 2016 D 9534, including but not limited to any and all emails in the email thread with subject line "IRMO Matt; 2016 D 9534; COURT ORDER".
- 2. Any and all documentation in support of your July 21, 2020 order "FILE APPEARANCE OR JURY DEMAND ALLOWED" entered in The Circuit Court of Cook County on behalf of participant Megan Matt (nka Megan Mason), this includes but is not limited to any correspondence requesting leave to file an appearance, a completed Illinois Standardized Forms Approved Appearance form, or motion for leave to file an appearance.

Notice	to	De	none	nt.
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<ol> <li>□ The deponent is a public or property matter(s) on which examination</li> </ol>			rship, association, or governmental agency. The ws:		
or other persons to testify which that person will tes	has a duty to design on its behalf, and stify. Ill. Sup. Ct. R	gnate one or more officers, directors, or ma I may set forth, for each person designated,	the matters on		
-	•				
, <u>, , , , , , , , , , , , , , , , , , </u>	party or witnesses of by stipulation of	shall exceed three hours regardless of the n f the parties or by order upon showing that			
O Atty. No.:					
• Pro Se 99500					
Name: Megan Mason		_			
Atty. for (if applicable):		Issued by: /s/Signature			
		- Cloub of	Court		
Addres					
City: \frac{1}{2}					
State:					
Teleph					
Primar					
			ı		
☐ I served this subpoena by mailing	g a copy, as require	ed by Ill. Sup. Ct. Rules 11, 12 and 204(a) (2)	),		
- ,		by certified mail, return receipt requested	,,		
		. I paid the witness \$	for		
<u> </u>	ng a copy to				
		for witness and mileage fees.			
/s/(Signature of Server)		(Print Name)			

**Exhibit N** 

to get more information and Zoom Meeting IDs. Remote Court Date: No hearing scheduled

Exhibit O

FILED DATE: 2/27/2023 9:42 AM 2016D009534

FILED 2/27/2023 9:42 AM IRIS Y. MARTINEZ CIRCUIT CLERK COOK COUNTY, IL 2016D009534 Calendar, 23 21628743

Subpoena in a Civil Matter (For Testimony and/or Documents)

(12/01/20) CCG 0106 A

Subjection in a civil fraction (15) Testimony and of Documents)	
IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS	
Peter Matt	
Plaintiff/Petitioner v. Case No. 2016 D 9534  Megan Matt (NKA Megan Mason)	
Defendant/Respondent	
SUBPOENA IN A CIVIL MATTER  (For Testimony and/or Documents)  To: Judge Bradley Trowbridge, Personally Personally 50 W. Washington Street, Rm. 400 Chicago, Illinois 60602  As Lay Witness to Events and Facts Related to Section 2-140	)1 Peti
1. YOU ARE COMMANDED to appear to give your testimony before the  Honorable Judge Presiding TBD in Room 2108  The Circuit Court of Cook County Daley Center , Illinois on May 2  at 1:00	
, Illinois on	
at O AM O PM  3. YOU ARE COMMANDED to mail the following documents in your possession or control to .  on o	
Description communication attached page(s).	

### **Exhibit O**

Subpoena Bradley Trowbridge for Hearing On Section 2-1401 Petition

- 1. The March 10, 2020 Proof of Service of a Petition for Rule to Show Cause served upon you on March 10, 2020. *on behalf of Megan Mason in case 2016 D 9534*.
- 2. All emails between yourself and any of the following parties regarding case 2016 D 9534: Christopher Wehrman, Kaye Mason, Robert Johnson, and Micchael Bender, including but not limited to the March 10, 2020 email from Mr. Christopher Wherman by which you were presented with the March 10, 2020 Petition for Rule to Show Cause, and signed Proof of Service for the same, served to you by email on behalf of your client Megan Mason.

Notice to Deponent.	
1.   The deponent is a public or private commatter(s) on which examination is required.	rporation, partnership, association, or governmental agency. The nested are as follows:
	ty to designate one or more officers, directors, or managing agents, ehalf, and may set forth, for each person designated, the matters on
1	rded by use of an audio-visual recording device, operated
by	
by(Name of Recording Device	ce Operator)
, ,	vitnesses shall exceed three hours regardless of the number of ulation of the parties or by order upon showing that good cause Ct. Rule 206(d).
O Atty. No.:	
• Pro Se 99500	
Name: Megan Mason	
Atty. for (if applicable):	Issued by: /s/
	Signature
A 11	○ Clerk of Court
Addr	
City:	
State	
Telep	
Prime	
☐ I served this subpoena by mailing a copy, a	as required by III. Sup. Ct. Rules 11, 12 and 204(a) (2),
1 , 0 1,,	
	by certified mail, return receipt requested
	on for
witness and mileage fees.	
☐ I served this subpoena by handing a copy	to
on I paid the witness \$ _	for witness and mileage fees.
/s/	
(Signature of Server)	(Print Name)

to get more information and Zoom Meeting IDs.

Remote Court Date: No hearing scheduled

FILED DATE: 2/27/2023 9:42 AM 2016D009534

Exhibit P

FILED 2/27/2023 9:42 AM IRIS Y. MARTINEZ CIRCUIT CLERK COOK COUNTY, IL 2016D009534 Calendar, 23 21628743

Subpoena in a Civil Matter (For Testimony and/or Documents)

(12/01/20) CCG 0106 A

Peter Matt	
Plaintiff/Petitioner v. Case No. 2016 D 9534	
Megan Matt (NKA Megan Mason)	
Defendant/Respondent	
SUBPOENA IN A CIVIL MATTER (For Testimony and/or Documents)  To May Mayor Personally (1997)	1 D 444
To: Ms. Kaye Mason, Personally 50 W. Washington St., Rm. 2108 Chicago, Illinois 60602  **As Lay Witness to Events and Facts Related to Section 2-140**  Chicago, Illinois 60602	1 Реппоп
1. ☑ YOU ARE COMMANDED to appear to give your testimony before the	
Honorable Judge Presiding TBD in Room 2108,	
The Circuit Court of Cook County Daley Center , Illinois on May 2	
at <u>1:00</u> O AM <b>Ø</b> PM	
2.   YOU ARE COMMANDED to appear and give your deposition testimony before a Notary Public	
at: in Room	,
, Illinois on	
at O AM O PM	
3. YOU ARE COMMANDED to mail the following documents in your possession or control	
to Megan Mason	
on c	

 $oldsymbol{\boxtimes}$  Description continued on attached page(s).

### Exhibit P

Subpoena Robert Johnson for Hearing On Section 2-1401 Petition

- All emails in your possession related to case 2016 D 9534, including but not limited to any and all emails in the email thread with subject line "IRMO Matt; 2016 D 9534; COURT ORDER".
- 2. Any and all documentation in support of an order entered by Judge Robert Johnson on July 21, 2020: "FILE APPEARANCE OR JURY DEMAND ALLOWED", entered in The Circuit Court of Cook County on behalf of participant Megan Matt (nka Megan Mason). This includes but is not limited to any correspondence requesting leave to file an appearance, a completed Illinois Standardized Forms Approved Appearance form, or motion for leave to file an appearance.

Notice to Deponent:	
1.   The deponent is a public or private corporation, matter(s) on which examination is requested are a	partnership, association, or governmental agency. The as follows:
☐ Description continued on attached page(s).	
or other persons to testify on its behalf, and i	mate one or more officers, directors, or managing agents, may set forth, for each person designated, the matters on
which that person will testify. Ill. Sup. Ct. Ru 2. $\Box$ The deponent's testimony will be recorded by us	
by(Name of Recording Device Operator)	
3. No discovery deposition of any party or witnesses sh	hall exceed three hours regardless of the number of the parties or by order upon showing that good cause
O Atty. No.:	
• Pro Se 99500	
Name: Megan Mason	
Atty. for (if applicable):	Issued by: /s/
	Signature  Clerk of Court
Address	Clerk of Court
City: W	
State:	
Telepho	
Primary	
☐ I served this subpoena by mailing a copy, as required	
tob	y certified mail, return receipt requested
(Receipt #) on witness and mileage fees.	I paid the witness \$ for
☐ I served this subpoena by handing a copy to	
on I paid the witness \$	for witness and mileage fees.
/s/	
/s/(Signature of Server)	(Print Name)

to get more information and Zoom Meeting IDs.

Remote Court Date: No hearing scheduled

FILED DATE: 2/27/2023 9:42 AM 2016D009534

Exhibit Q

FILED 2/27/2023 9:42 AM IRIS Y. MARTINEZ CIRCUIT CLERK COOK COUNTY, IL 2016D009534 Calendar, 23 21628743

Subpoena in a Civil Matter (For Testimony and/or Documents)

(12/01/20) CCG 0106 A

Defendant/Respondent  Michael Bender Caesar Bender LLP To: 150 N. Michigan Ave., #2130 Chicago, IL 60601  SUBPOENA IN A CIVIL MATTER (For Testimony and/or Documents)  You are called as a lay witness to events and facts in support of Megan Mason's Section 2-1401 Petition before this court.
Plaintiff/Petitioner v.  Megan Matt (NKA Megan Mason)  Defendant/Respondent  SUBPOENA IN A CIVIL MATTER (For Testimony and/or Documents)  You are called as a lay witness to events and facts in support of Megan Mason's Section 2-1401 Petition before this court.  1. YOU ARE COMMANDED to appear to give your testimony before the Honorable  Judge Presiding TBD  in Room  2016 D 9534  Case No.  2016 D 9534  SUBPOENA IN A CIVIL MATTER (For Testimony and/or Documents)  You are called as a lay witness to events and facts in support of Megan Mason's Section 2-1401 Petition before this court.
Megan Matt (NKA Megan Mason)  Defendant/Respondent  Michael Bender Caesar Bender LLP To: 150 N. Michigan Ave., #2130 Chicago, IL 60601  SUBPOENA IN A CIVIL MATTER (For Testimony and/or Documents)  You are called as a lay witness to events and facts in support of Megan Mason's Section 2-1401 Petition before this court.  1. YOU ARE COMMANDED to appear to give your testimony before the Honorable Judge Presiding TBD
Michael Bender Caesar Bender LLP 150 N. Michigan Ave., #2130 Chicago, IL 60601  SUBPOENA IN A CIVIL MATTER (For Testimony and/or Documents)  You are called as a lay witness to events and facts in support of Megan Mason's Section 2-1401 Petition before this court.  1. YOU ARE COMMANDED to appear to give your testimony before the Honorable  Judge Presiding TBD  in Room  2108
Michael Bender Caesar Bender LLP To: 150 N. Michigan Ave., #2130 Chicago, IL 60601  You are called as a lay witness to events and facts in support of Megan Mason's Section 2-1401 Petition before this court.  YOU ARE COMMANDED to appear to give your testimony before the Honorable  Judge Presiding TBD  in Room  2108  ,
Caesar Bender LLP To: 150 N. Michigan Ave., #2130 Chicago, IL 60601  You are called as a lay witness to events and facts in support of Megan Mason's Section 2-1401 Petition before this court.  1. YOU ARE COMMANDED to appear to give your testimony before the Honorable Judge Presiding TBD in Room
Honorable Judge Presiding TBD in Room 2108,
at 1:00 O AM & PM
2.   YOU ARE COMMANDED to appear and give your deposition testimony before a Notary Public
at:in Room
, Illinois on
at O AM O PM
3. YOU ARE COMMANDED to mail the following
Magan Masan
on or before March 6, $2023_{at}$ 3:00

☐ Description continued on attached page(s).

### Exhibit Q

Subpoena for Documents and Testimony at Hearing On Section 2-1401 Petition

- All emails in your possession related to case 2016 D 9534, including but not limited to any and all emails in the email thread with subject line "IRMO Matt; 2016 D 9534; COURT ORDER".
- 2. Any and all documentation in support of an order entered by Judge Robert Johnson on July 21, 2020: "FILE APPEARANCE OR JURY DEMAND ALLOWED", entered in The Circuit Court of Cook County on behalf of participant Megan Matt (nka Megan Mason). This includes but is not limited to any correspondence requesting leave to file an appearance, a completed Illinois Standardized Forms Approved Appearance form, or motion for leave to file an appearance.

Notice to Deponent:	
1.   The deponent is a public or private corporation, matter(s) on which examination is requested are a	partnership, association, or governmental agency. The as follows:
☐ Description continued on attached page(s).  (A nonparty organization has a duty to design	nate one or more officers, directors, or managing agents,
or other persons to testify on its behalf, and r	may set forth, for each person designated, the matters on
which that person will testify. Ill. Sup. Ct. Ru 2.   The deponent's testimony will be recorded by use	
by(Name of Recording Device Operator)	·
3. No discovery deposition of any party or witnesses she parties involved in the case, except by stipulation of the warrants a lengthier examination. Ill. Sup. Ct. Rule 20	all exceed three hours regardless of the number of the parties or by order upon showing that good cause
○ Atty. No.:	
• Pro Se 99500	
Name: Megan Mason	
Atty. for (if applicable):	Issued by: /s/
	Signature  Clerk of Court
Address:	
City: Wil	
State: I	
Telephon	
Primary F	
☐ I served this subpoena by mailing a copy, as required	by Ill. Sup. Ct. Rules 11, 12 and 204(a) (2),
tob	v certified mail, return receipt requested
(Receipt #) on	
witness and mileage fees.	. I paid the witness \$ for
☐ I served this subpoena by handing a copy to	
on I paid the witness \$	
/s/(Signature of Server)	(Print Name)

FILED DATE: 2/27/2023 9:42 AM 2016D009534

Remote Court Date: No hearing scheduled

Exhibit R

FILED 2/27/2023 9:42 AM IRIS Y. MARTINEZ CIRCUIT CLERK COOK COUNTY, IL 2016D009534 Calendar, 23 21628743

Subpoena in a Civil Matter (For Testimony and/or Documents)

(12/01/20) CCG 0106 A

	IN THE CIRCUIT COURT C	OF COOK COUNTY, ILLINOIS
Peter	Matt	
	Plaintiff/Petitioner	2016 D 9534
<b>M</b>	V.	Case No. 2016 D 9534
Mega	n Matt (NKA Megan Mason)	
	Defendant/Respondent	
		A CIVIL MATTER and/or Documents)
То:	Dr. Jonathan Palen C/O Honorable Regina A. Scannicchio 50 W. Washington St. Pm. 3010	e called as a lay witness to events and facts in t of Megan Mason's Section 2-1401 Petition this court.
1.	YOU ARE COMMANDED to appear to give yo	our testimony before the
	Honorable Judge Presiding TBD	in Room,
	The Circuit Court of Cook County Daley Cent	
	at 1:00 O AM & PM	, , , , , , , , , , , , , , , , ,
2. 🗆		your deposition testimony before a Notary Public
		in Room
		, Illinois on
	at O AM O PM	
3. Y	OU ARE COMMANDED to mail the follow	
to	Megan Mason	
О	n or before March 6, $2023_{at}$ 3:00	$\mathscr{S}$

### **Exhibit R**

Subpoena for Documents and Testimony at Hearing On Section 2-1401 Petition

- All emails in your possession related to case 2016 D 9534, including but not limited to any and all emails in the email thread with subject line "IRMO Matt; 2016 D 9534; COURT ORDER".
- 2. Any and all documentation in support of an order entered by Judge Robert Johnson on July 21, 2020: "FILE APPEARANCE OR JURY DEMAND ALLOWED", entered in The Circuit Court of Cook County on behalf of participant Megan Matt (nka Megan Mason). This includes but is not limited to any correspondence requesting leave to file an appearance, a completed Illinois Standardized Forms Approved Appearance form, or motion for leave to file an appearance.

Notice to Deponent.	
1.   The deponent is a public or private corporation, matter(s) on which examination is requested are	, partnership, association, or governmental agency. The as follows:
or other persons to testify on its behalf, and which that person will testify. Ill. Sup. Ct. Ru	
2. $\square$ The deponent's testimony will be recorded by us	se of an audio-visual recording device, operated
by(Name of Recording Device Operator	·
3. No discovery deposition of any party or witnesses s	hall exceed three hours regardless of the number of the parties or by order upon showing that good cause
O Atty. No.:	
• Pro Se 99500	
Name: Megan Mason	_
Atty. for (if applicable):	Issued by: /s/
	Signature
Address	orney O Clerk of Court
City: W	
State: _	
Telepho	
Primary	
☐ I served this subpoena by mailing a copy, as required	d by Ill. Sup. Ct. Rules 11, 12 and 204(a) (2),
to1	by certified mail, return receipt requested
(Receipt #) on) on	I paid the witness \$ for
☐ I served this subpoena by handing a copy to	
on I paid the witness \$	for witness and mileage fees.
/s/(Signature of Server)	(Print Name)

Remote Court Date: No hearing scheduled

### **Exhibit S**

FILED 2/27/2023 9:42 AM IRIS Y. MARTINEZ CIRCUIT CLERK COOK COUNTY, IL 2016D009534 Calendar, 23 21628743

Subpoena in a Civil Matter (For Testimony and/or Documents)

(12/01/20) CCG 0106 A

ouspould in a civil number (1 of 100 miles) with, of 2	(=2, 01, 20, 300 010011
IN THE CIRCUIT COURT O	F COOK COUNTY, ILLINOIS
Peter Matt	
Plaintiff/Petitioner	2014 D 0524
v.	Case No. 2016 D 9534
Megan Matt (NKA Megan Mason)	
Defendant/Respondent	
SUBPOENA IN A	A CIVIL MATTER
· · · · · · · · · · · · · · · · · · ·	nd/or Documents)
To: Christopher Wehrman 2345 Waukegan Rd Suite 150 Bannockburn, IL 60015	You are called as a lay witness to events and facts in support of Megan Mason's Section 2-1401 Petition before this court.
1. YOU ARE COMMANDED to appear to give yo	our testimony before the
Honorable Judge Presiding TBD	in Room 2108
The Circuit Court of Cook County Daley Center	
at 1:00 O AM <b>Ø</b> PM	
2.   YOU ARE COMMANDED to appear and give y	your deposition testimony before a Notary Public
at:	
at O AM O PM	
3. YOU ARE COMMANDED to mail the following	
to Megan Mason a	
on or before March 6, $2023_{\rm at}$ 3:00	
✓ Description continued on attached page(s).	
Description continued on attached page(s).	

Iris Y. Martinez, Clerk of the Circuit Court of Cook County, Illinois cookcountyclerkofcourt.org

### **Exhibit S**

Subpoena for Documents and Testimony at Hearing On Section 2-1401 Petition

- All emails in your possession related to case 2016 D 9534, including but not limited to any and all emails in the email thread with subject line "IRMO Matt; 2016 D 9534; COURT ORDER".
- 2. Any and all documentation in support of an order entered by Judge Robert Johnson on July 21, 2020: "FILE APPEARANCE OR JURY DEMAND ALLOWED", entered in The Circuit Court of Cook County on behalf of participant Megan Matt (nka Megan Mason). This includes but is not limited to any correspondence requesting leave to file an appearance, a completed Illinois Standardized Forms Approved Appearance form, or motion for leave to file an appearance.

Notice to Deponent:	
1.   The deponent is a public or private corpor matter(s) on which examination is requested.	ration, partnership, association, or governmental agency. The ed are as follows:
☐ Description continued on attached page	
(A nonparty organization has a duty to	designate one or more officers, directors, or managing agents, f, and may set forth, for each person designated, the matters on
which that person will testify. Ill. Sup.	Ct. Rule 206.)
2. $\square$ The deponent's testimony will be recorded	l by use of an audio-visual recording device, operated
by(Name of Recording Device O <sub>1</sub>	·
3. No discovery deposition of any party or witne	sses shall exceed three hours regardless of the number of on of the parties or by order upon showing that good cause
○ Atty. No.:	
• Pro Se 99500	
Name: Megan Mason	
Atty. for (if applicable):	Issued by: /s/
	Signature  Attorney O Clerk of Court
Address	7 Attorney O Clerk of Court
City: W	
State: _	
Telepho	
Primary	
□ I se	Rules 11, 12 and 204(a) (2),
to	by certified mail, return receipt requested
(Receipt #) on witness and mileage fees.	I paid the witness \$ for
☐ I served this subpoena by handing a copy to _	
on I paid the witness \$	for witness and mileage fees.
/s/	
(Signature of Server)	(Print Name)