

FILED
7/18/2023 11:01 AM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2016D009534
Calendar, 23
23576818

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

IN RE: THE MARRIAGE OF)
)
PETER MATT,)
Petitioner,)
)
and)
)
MEGAN MASON,)
Respondent.)

No. 2016 D 9534

**PETITION FOR APPROVAL OF GUARDIAN AD LITEM FEES
AND ALLOCATION OF PAYMENT**

NOW COMES, the Guardian *ad Litem*, MICHAEL IAN BENDER, and pursuant to 750 ILCS 5/506(b), ask this Honorable Court for the following: (1) To approve his fees as reasonable and necessary; and (2) to enforce payment of said fees per the July 14, 2023 Order, stating the following in support:

1. On June 6, 2019, this Honorable Court appointed Michael Ian Bender as Guardian *ad Litem* in this matter. Pursuant to the June 6, 2019 Appointment Order, both parties were ordered to pay Michael Ian Bender \$500.00 each as and for a retainer. A true and correct copy of the June 6, 2019 Appointment Order is attached hereto as **Exhibit A**.
2. Michael Ian Bender, in said capacity, has diligently investigated and reported regarding the best interests of the minor children and related matters.
3. Michael Ian Bender's reduced billing rate is \$375.00 per hour.
4. Michael Ian Bender's normal billing rate is \$500.00 per hour for out-of-court matters and \$700.00 per hour for in-court matters.
5. On November 16, 2021, this Honorable Court entered an order stating, in pertinent part, as follows:

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“1. The Guardian *ad litem*, Michael Bender’s, fees for the period of September 4, 2019 through October 7, 2021 are necessary and reasonable.

2. The allocation of the Guardian *ad litem*’s fees is a 50/50 split and shall continue to be a 50/50 split between the parties.

3. Petitioner, Peter Matt, owes Michael Bender \$89.00 for fees incurred through October 7, 2021. Peter Matt shall pay \$89.00 to Michael Bender on or before December 15, 2021.

4. Respondent, Megan Mason, owes Michael Bender \$4,629.75 for fees incurred through October 7, 2021. Megan Mason shall pay Michael Bender \$500 per month until the \$4,629.75 is paid in full. Said payments shall begin on December 15, 2021 and shall continue on the 15th of each month thereafter.” A true and correct copy of the November 16, 2021 Order is attached hereto as **Exhibit B**.

6. On July 14, 2023, this Honorable Court reallocated the Guardian *ad Litem*’s fees as follows: “Megan Matt shall pay 60% and Peter Matt 40% of the GAL fees since the appointment of the GAL, and those going forward.” A true and correct copy of the July 14, 2023 Order submitted for entry is attached hereto as **Exhibit C**.

7. Michael Ian Bender is owed \$19,667.43 in fees for the services rendered since his June 6, 2019 appointment through July 14, 2023. See billing statements incorporated by reference at **Exhibit D**.

8. The total amount of fees for the services rendered from June 6, 2019 to July 14, 2023 is \$44,610.75. Per the July 14, 2023 Order reallocating Michael Ian Bender’s fees, at 40%, Peter Matt owed \$17,844.30, and at 60%, Megan Mason owed \$26,766.45.

9. Megan Mason has paid \$3,929.00 of the \$26,766.45, leaving a balance of \$22,837.45 owed to the Guardian *ad Litem*.

10. Peter Matt has paid Michael Ian Bender \$21,014.32 of which \$3,170.02 is the responsibility of Megan Mason. Megan Mason, accordingly, owes Peter Matt \$3,170.02.

11. Given that Peter Matt paid Michael Ian Bender \$3,170.02 towards Megan Mason's fees, Megan Mason owes Michael Ian Bender \$19,667.43 in fees for the services rendered from June 6, 2019 to July 14, 2023, and she owes Peter Matt \$3,170.02 for reimbursement of fees paid on her behalf to Michael Ian Bender.

12. Michael Ian Bender respectfully asks this Honorable Court to find that said services and billing were necessary and reasonable.

13. Michael Ian Bender also respectfully asks this Honorable Court to enter a Judgment in favor of Caesar & Bender, LLP and against Megan Mason in the amount of \$19,667.43. A true and correct copy of a proposed Judgment for entry is attached hereto as **Exhibit E**.

14. Megan Mason is gainfully employed and, therefore, the Guardian *ad Litem* asks this Honorable Court for leave to issue the "Citation to Discover Assets to Debtor's Employer" attached hereto as **Exhibit F**, as well as a return date for Megan Mason's employer to respond to the attached Citation to Discover Assets to Debtor's Employer.

WHEREFORE, the Guardian *ad Litem*, MICHAEL IAN BENDER, asks this Honorable Court to enter the following:

- (A) A finding that the fees and billing are necessary and reasonable;
- (B) A judgment against Megan Mason and in favor of Caesar & Bender, LLP in the amount of \$19,667.43;
- (C) Leave for Caesar & Bender, LLP to issue the attached Citation to Discover Assets to Debtor's Employer;
- (D) A return date for Megan Mason's employer to respond to the attached Citation to Discover Assets to Debtor's Employer;
- (E) An order requiring Megan Mason to reimburse Peter Matt \$3,170.02; and

(F) An order for such other relief as this Honorable Court deems fit.

Respectfully submitted,

Michael A. Bender

Michael Ian Bender, Guardian *ad Litem*

Michael Ian Bender
Guardian *ad Litem*
CAESAR & BENDER, LLP
150 N. Michigan Avenue, Suite 2130
Chicago, Illinois 60601
312-236-1500
Attorney No.: 63030
service@caesarbenderlaw.com

VERIFICATION

Under the penalties as provided by law pursuant to 735 ILCS 5/1-109 of the Illinois Code of Civil Procedure, the undersigned verifies that the statements set forth in this pleading are true and correct, except to matters therein stated to be on information and belief, and as to such matters, the undersigned certifies as aforesaid that he verily believes the same to be true.

/s/ Michael Ian Bender
Guardian ad litem

CAESAR & BENDER, LLP
Guardian ad litem
150 N Michigan Ave., Suite 2130
Chicago, IL 60601
(312) 236-1500
Attorney No.: 63030
service@caesarbenderlaw.com



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

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IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2016D009534
Calendar, 23
23576818

IN RE: Marriage Civil Union Legal Separation Allocation of Parental Responsibilities
 Visitation (Non-Parent) Support Parentage of:

Peter Matt
Petitioner
and
Megan Matt
Respondent

No.: 2016 D 23
Calendar: 23
 Prejudgment
 Post Judgment - Enforcement
 Post Judgment - Modification
 Other

ORDER APPOINTING CHILD'S REPRESENTATIVE, GUARDIAN AD LITEM OR ATTORNEY FOR MINOR CHILD(REN)

On motion of Peter Matt and pursuant to 750 ILCS 5/506 and the inherent power of the Court, the Court being fully advised in the premises FINDS THAT:

A. There are issues within the family affecting the minor child(ren):

Child(ren)'s Name(s)	Date of Birth	Resides with	Child(ren)'s Name(s)	Date of Birth	Resides with
<u>[Redacted]</u>	<u>[Redacted]</u>	<u>Both</u>			
<u>[Redacted]</u>	<u>[Redacted]</u>	<u>Both</u>			

B. It is in the best interest of the child(ren) to have a legal representative appointed to protect and preserve their interests.

IT IS HEREBY ORDERED THAT:

- Name: Michael Bender
Address: 150 N. Michigan, Suite 2130 Chicago IL 60601
Telephone: 312/236-1500 Facsimile: _____
Email: mbender@caesarbenderlaw.com
is appointed CHILD'S REPRESENTATIVE GUARDIAN AD LITEM ATTORNEY FOR THE MINOR CHILD(REN)
Issues: medication, extracurricular activities, unstructured travel, communication, therapy, and school selection.
- During the proceedings the court may appoint an additional attorney to serve in another of the enumerated capacities on its own motion or that of a party only for good cause shown and when the reasons for the additional appointment are set forth in specific findings.
- Within seven (7) days of the entry of this order, attorney for Petitioner Respondent other _____ shall send the child's representative, guardian ad litem, or the attorney for the minor child(ren) copies of this order, and all notices, pleadings, orders and reports relative to this cause.
- The child's representative, guardian ad litem, or the attorney for the minor child(ren) shall be kept fully informed by counsel for all parties as to the status of this cause and shall have the full assistance of counsel in obtaining any waivers (e.g. for school or medical records, etc.) appropriate to the representation of the minor child(ren).
- 4234
 An appearance shall be filed on behalf of the minor child(ren) within seven (7) days of receipt of this order and any appropriate pleadings within twenty-eight (28) days from the date of this order.

6A. The child's representative, guardian ad litem, or the attorney for the minor child(ren) shall serve pro bono; OR

4636

6B. The child's representative, guardian ad litem, or the attorney for the minor child(ren) shall be entitled to reasonable temporary and permanent fees and costs pursuant to statute. Without prejudice to the right of either party for an accounting and an apportionment among the parties, the parties shall pay to the child's representative, guardian ad litem, or the attorney for the minor child(ren) as and for temporary prospective fees, within 7 days, the following amounts:

Hourly Rate: _____

Petitioner: \$ 500

Respondent: \$ 500

Other: \$ _____

7A. This appointment shall terminate thirty (30) days after entry of final judgment without further order of court; OR

7B. This appointment shall terminate only upon further order of court.

8. "Unless otherwise ordered by the court at the time fees and costs are approved, all fees and costs payable to an attorney, guardian ad litem, or child's representative under this Section {750 ILCS 5/506} are by implication deemed to be in the nature of support of the child and are within the exceptions to discharge in bankruptcy under 11 U.S.C.A.523. The provisions of Section 501 and 508 of this Act shall apply to fees and costs for attorneys appointed under this Section."
{750 ILCS 5/506}

9. Next Court Date: 7/25/19 at 9:30 a.m.

Petitioner's Name: Peter Matt

*Address: (Home) [Redacted] Telephone: (Home) 646/417-0618

*Address: (Work) [Redacted] Telephone: (Work) _____

Petitioner's Attorney: C. Wehrman / Swanson Matt & Bell Primary Email: cwehrman@smbrtrial.com

Address: 330 N. Wabasha # 3300, Chicago IL 60611 Secondary Email: _____

Telephone: 312/321-9100 Other: _____

Facsimile: 312/321-0990

Respondent's Name: Morgan Matt

*Address: (Home) [Redacted] Telephone: (Home) [Redacted]

*Address: (Work) [Redacted] Telephone: (Work) _____

Respondents Attorney: N/A Primary Email: _____

Address: _____ Secondary Email: _____

Telephone: _____ Other: _____

Facsimile: _____

***If a party has not disclosed an address, that party shall designate an alternative address for the purpose of notice.**

Atty. No.: 21558

Name: C. Wehrman / Swanson Matt & Bell

Atty. for: Petitioner

Address: 330 N. Wabasha # 3300

City/State/Zip Code: Chicago IL 60611

Telephone: 312/321-9100

Primary Email: cwehrman@smbrtrial.com

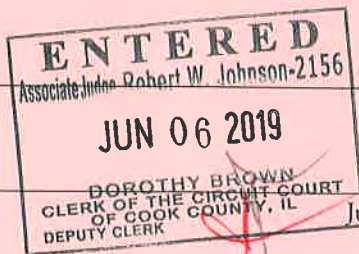
Secondary Email: _____

Other Email: _____

ENTERED:

Dated: _____

Judge _____ Judge's No. _____



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

IN RE THE MARRIAGE OF:)
)
PETER MATT,)
)
 Petitioner,)
and)
)
MEGAN MASON,)
)
 Respondent.)

No. 2016 D 9534

Calendar: 23

ENTERED
Judge Robert Johnson-2156
NOV 16 2021
IRIS Y. MARTINEZ
CLERK OF THE CIRCUIT COURT
OF COOK COUNTY, IL

ORDER

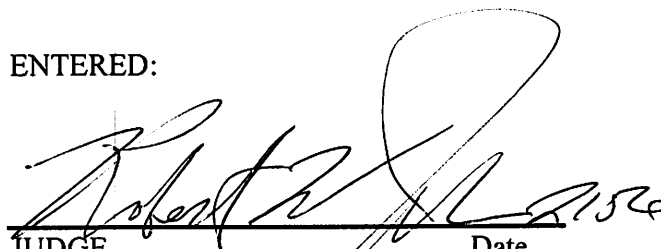
This matter coming to be heard for the Guardian *ad litem*'s Petition for Approval of Guardian *ad litem* Fees and Allocation of Payment, status on the 604.10(b) investigation, and counsel for Respondent's Motion to Withdraw, Petitioner appearing personally and through counsel, Respondent appearing personally and through counsel, the Guardian *ad litem* appearing, due notice having been given, and this Honorable Court being fully advised in the premises;

IT IS HEREBY ORDERED:

1. The Guardian *ad litem*, Michael Bender's, fees for the period of September 4, 2019 through October 7, 2021 are necessary and reasonable.
2. The allocation of Guardian *ad litem*'s fees is a 50/50 split and shall continue to be a 50/50 split between the parties.
3. Petitioner, Peter Matt, owes Michael Bender \$89.00 for fees incurred through October 7, 2021. Peter Matt shall pay \$89.00 to Michael Bender on or before December 15, 2021.
4. Respondent, Megan Mason, owes Michael Bender \$4,629.75 for fees incurred through October 7, 2021. Megan Mason shall pay Michael Bender \$500 per month until the \$4,629.75 is paid in full. Said payments shall begin on December 15, 2021 and shall continue on the 15th of each month thereafter.
5. Counsel for Respondent's Motion to Withdraw is granted by separate order.
6. This matter is set for status on the 604.10(b) investigation and ABA Therapy on December 6, 2021 at 10:00 a.m. via Zoom (ID: 934 9022 2003; Password: 543296).
7. An entered copy of this order shall be sent to:
 - a. Counsel for Petitioner, Christopher Wehrman: cwehrman@smbtrials.com
 - b. Respondent, Megan Mason: [REDACTED]

c. Guardian *ad litem*, Michael Bender: mbender@caesarbenderlaw.com

ENTERED:



JUDGE Date

CAESAR & BENDER, LLP
Guardian ad litem
150 N. Michigan Ave., Suite 2130
Chicago, IL 60601
312-236-1500
Atty No. 63030
service@caesarbenderlaw.com



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

IN RE: THE MARRIAGE OF)	
PETER MATT,)	
Petitioner,)	
)	Case No. 2016 D 9534
and)	Cal. 23
)	
MEGAN MATT,)	
Respondent.)	

ORDER

This cause coming before the Court for an in-person hearing on Peter Matt’s Second Motion for Section 508(b) Attorney’s Fees filed on June 4, 2022; Ruling on the amount of attorney’s fees Megan Matt shall pay to Peter Matt pursuant to the Rule 137 sanctions per the Court’s August 3, 2022 Order; Peter Matt’s Petition for Rule to Show Cause filed on March 3, 2023; Peter Matt’s Motion for Attorney’s Fees Pursuant to 60/214(b)(13) filed on May 2, 2023; Megan Matt’s Motion for Allocation of GAL Fees, Extraordinary Healthcare Costs, 604B Investigation Costs, and Attorney Fees for Megan Mason; Megan Matt’s Section 2-401 Petition for Relief from Judgment in August 21, 2020 Ruling of Contempt of Court; Megan Matt’s Motion to Vacate Plenary Order of Protection Entered in this Court Against Megan Mason on March 8, 2023, and the GAL’s Petition for Rule to Show Cause, Peter Matt appearing in person with Counsel, Megan Matt appearing in person on her own behalf, the GAL being present via Zoom, and the Court being advised:

IT IS HEREBY ORDERED:

1. Peter Matt’s Second Motion for Section 508(b) Attorney’s Fees filed on June 4, 2022 is granted. Megan Matt shall pay to Peter Matt the amount of \$5,407.50 as and for her obligation to pay Peter Matt’s attorney’s fees and costs following the finding of contempt on April 4, 2022. The obligation under this paragraph constitutes the kind of debt that is not dischargeable in bankruptcy pursuant to 11 U.S.C.A §523(a)(15). Megan Matt is therefore barred as to any defenses to the non-dischargeability of the payments required by this paragraph which she would otherwise be entitled to present in case of her voluntary or involuntary bankruptcy, including, but not limited to, discharge under Chapter 13, or any other chapter of the United States Bankruptcy Code.
2. Following the Court’s ruling the amount of attorney’s fees Megan Matt shall pay to Peter Matt pursuant to the Rule 137 sanctions per the Court’s August 3, 2022 Order, Megan Matt shall pay to Peter Matt the amount of \$12,320.00 as and for Rule 137 sanctions. The obligation under this paragraph constitutes the kind of debt that is not dischargeable in bankruptcy pursuant to 11 U.S.C.A §523(a)(15). Megan Matt is therefore barred as to any defenses to the non-dischargeability of the payments required by this paragraph which she would otherwise be entitled to present in case of her voluntary or involuntary

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bankruptcy, including, but not limited to, discharge under Chapter 13, or any other chapter of the United States Bankruptcy Code.

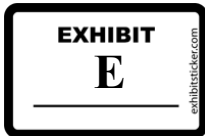
3. Peter Matt's Petition for Rule to Show Cause filed on March 3, 2023 is granted. Megan Matt is found to be indirect civil contempt of court following the issuance of a Rule and her failure to comply with Article V, Paragraph F(2)(ii) of the Marital Settlement Agreement incorporated into the Judgment after failing to provide a legal sufficient reason for said failure. Megan Matt's testimony that she wrote the identified letters in the petition, as well as her testimony that she called the FBI twice, send two emails, and submitted other letters to seek Peter Matt's deportation is in part the basis that her failure is willful and contumacious. The Court's issuance of a purge is continued to the next court date.
4. Peter Matt's Motion for Attorney's Fees Pursuant to 60/214(b)(13) filed on May 2, 2023 is granted. Megan Matt shall pay to Peter Matt the amount of \$9,100.00 as and for 750 ILCS 60/214(b)(13). The obligation under this paragraph constitutes the kind of debt that is not dischargeable in bankruptcy pursuant to 11 U.S.C.A §523(a)(15). Megan Matt is therefore barred as to any defenses to the non-dischargeability of the payments required by this paragraph which she would otherwise be entitled to present in case of her voluntary or involuntary bankruptcy, including, but not limited to, discharge under Chapter 13, or any other chapter of the United States Bankruptcy Code.
5. Megan Matt's Motion for Allocation of GAL Fees, Extraordinary Healthcare Costs, 604B Investigation Costs, and Attorney Fees for Megan Mason is granted in part and denied in part.
 - a. Megan Matt is not awarded attorney's fees and that part of the motion is denied.
 - b. The allocation of healthcare costs as identified in the May 16, 2023 order shall stand, and that part of the motion is denied.
 - c. The re-allocation of GAL fees is granted and Megan Matt shall pay 60% and Peter Matt 40% of the GAL fees since the appointment of the GAL, and those going forward. The parties shall prepare calculations as to the amounts paid and owed by the next court date for the entry of an order identifying the amount of reimbursement owed from Megan Matt to Peter Matt.
 - d. The re-allocation of Section 604.10(b) fees is granted and Megan Matt shall pay 60% and Peter Matt 40% of the Section 604.10(b) fees since the appointment of both Section 604.10(b) experts and those going forward. The parties shall prepare calculations as to the amounts paid and owed by the next court date for the entry of an order identifying the amount of reimbursement owed from Megan Matt to Peter Matt.
6. Megan Matt's Section 2-401 Petition for Relief from Judgment in August 21, 2020 Ruling of Contempt of Court is denied.
7. Megan Matt's Motion to Vacate Plenary Order of Protection Entered in this Court Against Megan Mason on March 8, 2023 is denied.

8. The GAL has 28 days to amend his Petition for Rule to Show Cause and to file a fee petition consistent with the rulings herein.
9. This matter is set for status, order of purge, calculations as to GAL and Section 604.10(b) fees, payments from Megan Matt to Peter Matt and structure for same, and presentment of GAL motions on September 6, 2023 at 9:30 a.m. via Zoom.
10. Copies of this order to be tendered to
 - a. Counsel for Petitioner: pleadings@kgwlaw.com
 - b. Respondent [REDACTED]
 - c. GAL: mbender@caesarbenderlaw.com

ENTERED:

J U D G E

#35921
Christopher D. Wehrman (cwehrman@kgwlaw.com)
Katz, Goldstein & Warren
410 N. Michigan Ave., Ste. 400
Chicago, IL 60611
847/317-9500
Attorneys for Peter Matt
pleadings@kgwlaw.com



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

IN RE: THE MARRIAGE OF

PETER MATT,
Petitioner,

and

MEGAN MASON,
Respondent.

Case No. 2016 D 9534

Calendar: 23

ORDER

This matter coming before the Court for the Guardian *ad Litem*'s Petition for Approval of Guardian *ad Litem*'s Fees and Allocation of Payment; due notice having been given; and the Court being fully advised in the premises;

IT IS HEREBY ORDERED:

1. Judgment is entered in favor of Caesar & Bender, LLP and against Megan Mason in the amount of \$19,667.43. These fees are for Guardian *ad Litem* services for the minor children and, therefore, in the nature of child support and are not dischargeable in Bankruptcy.
2. A copy of this entered order shall be sent to:
 - a. Counsel for Petitioner: cwehrman@kgwlaw.com
 - b. Respondent: [REDACTED]
 - c. Guardian *ad Litem*: mbender@caesarbenderlaw.com

Michael Bender
Guardian ad Litem
CAESAR & BENDER, LLP
150 N. Michigan Ave., Suite 2130
Chicago, Illinois 60601
(312) 236-1500
Attorney No. 63030
service@caesarbenderlaw.com

ENTERED:

JUDGE Date

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STATE OF ILLINOIS, CIRCUIT COURT <u>Cook</u> COUNTY	CITATION TO DISCOVER ASSETS TO DEBTOR'S EMPLOYER	<i>For Court Use Only</i>
Instructions ▼ Directly above, enter the name of the county where the case was filed. Enter the name of the plaintiff. Enter the name of the defendant. Enter the name and address of the employer. Enter the case number.	<u>Michael Ian Bender</u> Plaintiff <i>(First, middle, last name)</i> v. <u>Megan Mason</u> Defendant <i>(First, middle, last name)</i> <u>Jefferies LLC</u> Respondent <i>(Employer's Business Name)</i> <u>520 Madison Avenue</u> <i>Street</i> <u>New York, NY 10022</u> <i>City State ZIP</i>	<u>2016 D 9534</u> Case Number

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In 1, if the debtor is a person, enter the name and address for the debtor. If the debtor is a business, enter the name and address of the registered agent. The registered agent can be found on the Illinois Secretary of State's website.

1. This citation and notice are being sent to you and the debtor because the creditor believes the debtor listed below is employed by you or works for you under some other contractual relationship:

Megan Mason
Debtor's name

In 2, enter the courtroom number, date and time of the court date, and address of the courthouse.

2. You must fill out the attached Answer to Citation / Proceeding form and file it or come to courtroom _____ on:

Number

_____ at _____ a.m. p.m.
Date Time

The address of the court is: _____
Street

City State ZIP

Notice to Debtor

- You can come to court on the court date listed in section 2. You may be able to claim certain protections (exemptions) at that court date. See *How to File an Emergency Motion to Claim Exemption* for information on how to file this *Motion*.
- If you need to be heard earlier than the court date listed in section 3, you can file an *Emergency Motion to Claim Exemption*.
- You do not have to come to court, but if you do not come to court, and you work for the employer, the court may garnish your paycheck.

Notice to Employer

- If you do not answer or come to the court date listed in section 2, the judge may do one of two things:
 - Issue a rule to show cause; OR
 - Enter a conditional judgment.
- If there is a rule to show cause court date, you will have to explain why you did not come to court on the court date and why you should not be found in contempt of court. If you do not come to the rule to show cause on the set court date, the judge may find you in contempt, and you might be arrested and jailed.
- If the court enters a conditional judgment, you will have 30 days to answer or appear. If you fail to do so, then the court may enter a final judgment against you.

3. The employer's duties and obligations:

- a. Fill out and return the *Answer* on page **4** on or before the court date listed on page **1**. The *Answer* asks basic questions about the debtor and their income.
- b. The first question in the *Answer* is whether the debtor is employed by you or works for you under some other contractual relationship.
 - i. If they do not, then check the "No" box, and send the form back.
 - ii. If the debtor does work for you, answer the rest of the *Answer* about pay periods, hourly wage, gross pay, and required deductions from gross pay. The *Answer* explains how to calculate the amount you need to withhold for the garnishment/turnover order.
 - iii. If a positive amount is listed on section **4M** on the *Answer*, withhold that amount until there is a court order to turn over the wages or the *Citation* is dismissed.
 - iv. If income varies, withholding must be recalculated for every pay period.
- c. Sign the form, file the original with the Circuit Clerk who issued the *Citation*, and keep a copy for yourself. Give or send a copy of the completed *Answer* to the debtor and to the creditor.
- d. Do not withhold any wages from the debtor if the debtor's income after taxes is equal to or less than 45 times (x) the federal or Illinois minimum wage, whichever is greater. ***Illinois minimum wage will increase between January 1, 2020 and January 1, 2025. See the Exempt Wages Table on the last page of this form to determine what wages are exempt based on the current minimum wage.*** If the debtor's wages after taxes are more than this exemption, then you should withhold either (1) 15% of the debtor's gross income or (2) the debtor's income after taxes minus the exemption, whichever is less. See how to calculate the amount in the *Answer*.

Do not turn over any funds until you receive a wage deduction/turnover order.

4. Certification by the creditor:

- a. A judgment was entered or renewed against Megan Mason ,
Name
 the debtor, on _____ .
Date
- b. The amount of the judgment is \$19,667.43 .
- c. The current amount that remains to be paid, including the creditor's court costs and post-judgment interest, minus any payment made by the debtor or on behalf of the debtor after the judgment was entered, is \$19,667.43 plus costs of this proceeding.

In **4a**, enter the name of the debtor and the date of the judgment. If the judgment has been renewed ("revived"), enter that date.

In **4b**, enter the amount of the judgment.

In **4c**, enter how much is still owed to you. You are entitled to the judgment amount, court costs (like filing fees, service fees, sheriff's fee, etc.), and post-judgment. Subtract any payments made by the debtor.

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You must mail this Citation by first-class regular mail to the debtor.

I certify I will mail by regular first-class mail a copy of the *Citation* to the debtor at the address shown above within 3 business days after service on the employer's Registered agent.

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 *Citation to Discover Assets to Debtor's Employer* 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/ Michael Bender
Your Signature

150 N Michigan Avenue, Suite 2130
Street Address

Michael Ian Bender
Print Your Name

Chicago, IL, 60601
City, State, ZIP

3122361500
Telephone

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

STOP!

The Circuit Clerk will fill in this section.

Witness this Date: _____

Seal of Court

Clerk of the Court: _____

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STATE OF ILLINOIS, CIRCUIT COURT <u>Cook</u> COUNTY	ANSWER TO CITATION PROCEEDING (TO BE FILLED OUT BY EMPLOYER)	<i>For Court Use Only</i> <u>2016 D 9534</u> Case Number
Instructions ▼ To creditor: Fill out this section in the same way you did on page 1. Do not complete the rest of the form. To employer: fill out page 4 and sign below.	<u>Michael Ian Bender</u> Plaintiff (<i>First, middle, last name</i>) v. <u>Megan Mason</u> Defendant (<i>First, middle, last name</i>) <u>Jefferies LLC</u> Respondent (<i>Employer's Business Name</i>)	

In 1, check the box that applies. If your answer is "No," enter the last date of employment and go to the Certification Section. If your answer is "Yes," complete the rest of the form.

In 2, check any boxes that apply.

NOTE: If income varies, withholding must be recalculated for every pay period.

In 3, check how often you pay the debtor.

In 4, enter the amounts for the most recent paycheck.

NOTE: If a number is negative, enclose in parentheses like this: (\$50.00).

In 4I, if the number is zero or a negative number, do not withhold any wages. If it is a positive number, continue the calculation.

The amount to be withheld is in 4M.

1. Do you pay any money to the debtor listed in section 1 on the *Citation*? Yes No
 If the debtor is no longer working for you, enter the last date employed: _____
Date
 2. Of the money paid to the debtor, is any of that money (*check all that apply*):
 - a. Subject to prior court ordered deduction (including child/spouse support)
 Case Number _____ State _____ County _____
 - b. Disability Retirement Otherwise exempt (*specify*): _____
- CALCULATION TO DETERMINE AMOUNT OF WITHHOLDING**
(If income varies, withholding must be recalculated for every pay period.)
3. Do you pay debtor: Every week Every two weeks Semi-monthly
 Monthly Other: _____
- | | | | | | | | | | | | | | | |
|---|---|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|
| <ol style="list-style-type: none"> 4. A. Gross wages per paycheck B. Mandatory contributions to pensions or retirement plan C. Subtract (B) from (A) D. Multiply (C) by 0.15 E. Total of FICA, State Tax, Federal Tax, and Medicare F. Subtract (E) from (C) G. Enter amount of exempt wages per pay period. See the Exempt Wages Table on the next page.
 If the pay period is not in this table, multiply the number of weeks in the pay period by the weekly exempt wages amount. H. Subtract (G) from (F) I. The <i>lesser</i> of (D) or (H) J. Child Support or other Court Ordered Deduction K. Subtract (J) from (I) L. Multiply (K) by 0.02 (statutory fees to the employer) M. Subtract (L) from (K) for amount to be withheld | <table style="width:100%; border: none;"> <tr><td>A. _____</td></tr> <tr><td>B. _____</td></tr> <tr><td>C. _____</td></tr> <tr><td>D. _____</td></tr> <tr><td>E. _____</td></tr> <tr><td>F. _____</td></tr> <tr><td>G. _____</td></tr> <tr><td>H. _____</td></tr> <tr><td>I. _____</td></tr> <tr><td>J. _____</td></tr> <tr><td>K. _____</td></tr> <tr><td>L. _____</td></tr> <tr><td>M. _____</td></tr> </table> | A. _____ | B. _____ | C. _____ | D. _____ | E. _____ | F. _____ | G. _____ | H. _____ | I. _____ | J. _____ | K. _____ | L. _____ | M. _____ |
| A. _____ | | | | | | | | | | | | | | |
| B. _____ | | | | | | | | | | | | | | |
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| L. _____ | | | | | | | | | | | | | | |
| M. _____ | | | | | | | | | | | | | | |

FILED DATE: 7/18/2023 11:01 AM 2016D009534

EXEMPT WAGES TABLE				
Timeframe:	If Paid Weekly	If Paid Every 2 Weeks	If Paid Semi-Monthly	If Paid Monthly
January 1, 2020 - June 30, 2020 <i>(Minimum Wage \$9.25/hr)</i>	\$416.25	\$832.50	\$901.88	\$1,803.75
July 1, 2020 – December 31, 2020 <i>(Minimum Wage \$10/hr)</i>	\$450	\$900	\$975	\$1,950
January 1, 2021 -December 31, 2021 <i>(Minimum Wage \$11/hr)</i>	\$495	\$990	\$1,072.50	\$2,145
January 1, 2022 -December 31, 2022 <i>(Minimum Wage \$12/hr)</i>	\$540	\$1,080	\$1,170	\$2,340
January 1, 2023 -December 31, 2023 <i>(Minimum Wage \$13/hr)</i>	\$585	\$1,170	\$1,267.50	\$2,535
January 1, 2024 -December 31, 2024 <i>(Minimum Wage \$14/hr)</i>	\$630	\$1,260	\$1,365	\$2,730
January 1, 2025 <i>(Minimum Wage \$15/hr)</i>	\$675	\$1,350	\$1,462.50	\$2,925

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 *Answer to Citation Proceeding* 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](#).

After you finish this form, sign and print your name.

Your Signature

Street Address

Enter your complete current address and telephone number.

Print Your Name

City, State, ZIP

File this *Answer* with the Circuit Clerk and send a copy to the Plaintiff/Plaintiff's attorney and the debtor.

Telephone