

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

2008
020
0100

JOHN DOE,

Plaintiff,

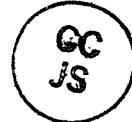
v.

CHICAGO SUN-TIMES, INC.

Defendant.

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Case No. 08L3902



This cause coming to be heard upon the Emergency Petition of Plaintiff for Leave to File Under Fictitious Names, due notice having been given and the Court being fully advised in the premises;

IT IS HEREBY ORDERED:

That Plaintiffs' Petition is allowed _____ denied.

v/231
V
M.B.

ENTER:

Thomas R. Chiola
JUDGE

David A. Novoselsky
NOVOSELSKY LAW OFFICES
120 North LaSalle Street, Suite 1400
Chicago, Illinois 60602
(312) 346-8930
Attorney ID No. 24578

ENTERED
JUDGE THOMAS R. CHIOLA-1651
APR 09 2008
DOROTHY BROWN
CLERK OF THE CIRCUIT COURT
OF COOK COUNTY, IL
DEPUTY CLERK

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

JOHN DOE

v.

CHICAGO SUN-TIMES, INC.



No.

20081003902
CALENDAR ROOM F
10:00 AM
10/01/08

CIVIL ACTION COVER SHEET - CASE INITIATION

A Civil Action Cover Sheet - Case Initiation shall be filed with the complaint in all civil actions. The information contained herein is for administrative purposes only and cannot be introduced into evidence. Please check the box in front of the appropriate case type which best characterizes your action. ONLY ONE (1) CASE TYPE MAY BE CHECKED WITH THIS COVER SHEET.

Jury Demand Yes No

PERSONAL INJURY/WRONGFUL DEATH

CASE TYPES:

- 027 Motor Vehicle
- 040 Medical Malpractice
- 047 Asbestos
- 048 Dram Shop
- 049 Product Liability
- 051 Construction Injuries
(including Structural Work Act, Road Construction Injuries Act and negligence)
- 052 Railroad/FELA
- 053 Pediatric Lead Exposure
- 061 Other Personal Injury/Wrongful Death
- 063 Intentional Tort
- 064 Miscellaneous Statutory Action
(Please Specify Below**)
- 065 Premises Liability
- 078 Fen-phen/Redux Litigation
- 199 Silicone Implant

TAX & MISCELLANEOUS REMEDIES

CASE TYPES:

- 007 Confession of Judgment
- 008 Replevin
- 009 Tax
- 015 Condemnation
- 017 Detinue
- 029 Unemployment Compensation
- 036 Administrative Review Action
- 085 Petition to Register Foreign Judgment
- 099 All Other Extraordinary Remedies

COMMERCIAL LITIGATION

CASE TYPES:

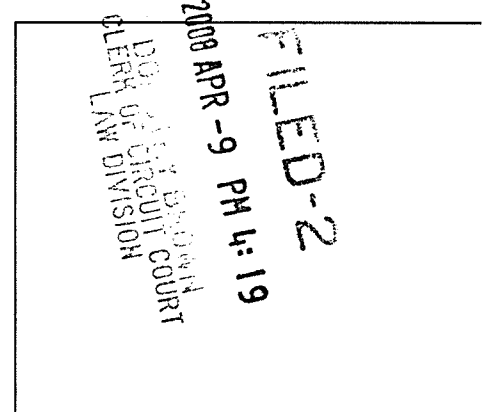
- 002 Breach of Contract
- 070 Professional Malpractice
(other than legal or medical)
- 071 Fraud
- 072 Consumer Fraud
- 073 Breach of Warranty
- 074 Statutory Action
(Please Specify Below**)
- 075 Other Commercial Litigation
(Please Specify Below**)
- 076 Retaliatory Discharge

OTHER ACTIONS

CASE TYPES:

- 062 Property Damage
- 066 Legal Malpractice
- 077 Libel/Slander
- 079 Petition for Qualified Orders
- 084 Petition to Issue Subpoena
- 100 Petition for Discovery

**



(FILE STAMP)

By: _____

(Attorney)

(Pro Se)

24578

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

CC
G.C.

FILED-2
2009 APR -9 PM 4:19
CIRCUIT COURT
LAW DIVISION

JOHN DOE,

Plaintiff,

v.

CHICAGO SUN-TIMES, INC.

Defendant.

Case No.

JURY DEMAND

3352
3004

EMERGENCY PETITION FOR LEAVE TO FILE UNDER FICTITIOUS NAME

NOW COMES the Plaintiff, JOHN DOE, by and through their counsel, Novoselsky Law Offices, and respectfully requests that this Honorable Court grant him leave to file his Complaint under the fictitious name as listed above. In support of this request, Plaintiffs states as follows:

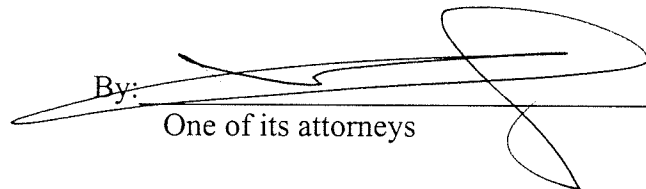
1. Section 5/2-401(e) of the Illinois Code of Civil Procedure (735 ILCS 5/2-401(e)) provides that upon "application and for good cause shown the parties may appear under fictitious names."
2. As set forth in the attached proposed complaint, this law suit arises from knowing and intentional misrepresentations and false statements regarding the Plaintiff made by the Chicago Sun-Times.
3. Illinois law provides specific protection which guarantees the anonymity of a party who has been subject to the commission of intentional tort.
4. The Defendant, Chicago Sun-Times, Inc., is a daily periodical newspaper with, based on information and belief, readers of over three million copies per day.
5. As this Court can see from the allegations of the attached pleading, the publication of the name of the Plaintiff would be contrary to public policy of the State of Illinois as it would expose Plaintiff to further harm, injury, and embarrassment without a concomitant benefit to him or any other party.

6. Plaintiff therefore respectfully submits that he has shown good cause and ask that this Court permit him to proceed in this fashion pursuant to 735 ILCS 5-2-401(e).

WHEREFORE, it is respectfully requested that this emergency petition for leave to file under fictitious name be granted.

Respectfully submitted,

JOHN DOE

By:  _____
One of its attorneys

David A. Novoselsky
Novoselsky Law Offices
120 North LaSalle Street, Suite 1400
Chicago, Illinois 60602
(312) 346-8930
Atty ID No. 24578

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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

JOHN DOE,)
)
 Plaintiff,)
) Case No.
 v.)
)
 CHICAGO SUN-TIMES, INC.) JURY DEMAND
)
 Defendant.)

COMPLAINT AT LAW

NOW COMES the Plaintiff, JOHN DOE, by and through his attorneys, Novoselsky Law Offices, and complains against the Chicago Sun-Times, Inc., as follows:

1. On October 18, 2007, and at all times relevant hereto, Plaintiff John Doe was a resident of the County of Cook.
2. On October 18, 2007, and at all times relevant hereto, Defendant Chicago Sun-Times, Inc., was an Illinois corporation with its principal place of business in Chicago, County of Cook, Illinois.
3. On October 18, 2007, Defendant published in its newspaper two articles regarding Plaintiff containing false and defamatory statements regarding the Plaintiff, including false and untrue statements alleging that the Plaintiff failed to pay taxes and was being responsible for bankruptcy of a company.

COUNT I

4. The statements set forth above were published to the general public, and are false and defamatory.
5. As a proximate result of the foregoing defamatory statements by Defendant, Plaintiff suffered injuries including injuries to his reputation.



6. The foregoing defamatory statements were made by the defendant with the knowledge of their falsity and with actual malice, so as to justify an award of punitive damages.

WHEREFORE, Plaintiff John Doe demands judgment against Defendant the Chicago-Sun-Times, Inc., for compensatory damages in the amount in excess of the minimum amount required for jurisdiction in the Law Division of Cook County and for exemplary damages in an amount which will be sufficient to serve punishment to Defendant and to deter defendant from similar conduct.

COUNT II

7. Plaintiff repeats and realleges paragraph 1 through 6 as paragraph 7 herein.

8. The contents, statements, representations, disclosures and implications of the above described newspaper article place Plaintiff in a false light before the public and his patients.

9. The false light in which Defendants placed Plaintiff John Doe would be highly offensive to a reasonable person.

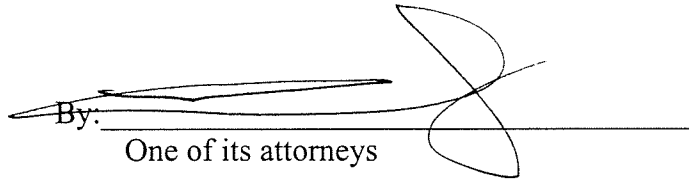
10. The contents, statements, representations, disclosures and implications of the above described statements concerning Plaintiff John Doe were all made maliciously and Defendants knew that the statements were false at the time that they made them and acted with a reckless disregard for whether the statements were true or false when they made the statements, representations and disclosures.

11. The intentional and malicious act of Defendant Chicago Sun-Times caused Plaintiff John Doe to suffer emotional distress, personal injury, embarrassment and loss of his reputation in his professional and personal communities.

WHEREFORE, Plaintiff John Doe, individually, demands judgment be entered against the Defendant the Chicago-Sun-Times Group in the amount in excess of \$50,000.00.

Respectfully submitted,

JOHN DOE

By:  _____
One of its attorneys

David A. Novoselsky
Novoselsky Law Offices
120 North LaSalle Street, Suite 1400
Chicago, Illinois 60602
(312) 346-8930
Atty ID No. 24578

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08-L-003902

DOE JOHN

Vs.

CHICAGO SUN TIMES INC

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LIBEL/SLANDER



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