

IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL
CIRCUIT OF ILLINOIS, CASS COUNTY, ILLINOIS

GWENDOLYN M. THOMAS,

Petitioner,

vs.

LUKE A. THOMAS,

Respondent.

No. 2022-DC-15
2022-OP-66

MOTION FOR SUBSTITUTION OF JUDGE

Now comes your Respondent, Luke A. Thomas, and for this Motion for
Substitution of Judge pursuant to 735 ILCS 5/2-1001(a)(1):

1. This Motion for Substitution is brought pursuant to 735 ILCS 5/2-1001(a)(1)
in each of the above numbered causes.
2. On several occasions following Respondent's diagnosis and prior to the
commencement of these proceedings, Petitioner would oftentimes share the fact she had collegial
discussions with many of the judges in the Eighth Judicial Circuit about Respondent's health
status, children, family, law firm, employment opportunities and other personal business
unrelated to matters pending before the Court. The full circumstances and substance of such
conversations and any opinions formed as a result are not fully known to Respondent.
3. Respondent, on the other hand, last appeared in any court in the circuit as an
attorney in May, 2019 and has otherwise been unable to practice law or maintain similar
relationships due to health and dedication to family responsibilities since said time.

4. Since the commencement of these proceedings and subsequent to the Honorable Jerry J. Hooker being appointed, contested or possibly contested factual issues unknown prior thereto involving the following have come to light:

A. The health, care, responsibility of providing care, and care providers involving one or more of the parties' minor children;

B. The physical and mental health of Respondent;

C. The physical and mental health of Petitioner;

D. The employability of Respondent;

E. The law firm of McClure, Thomas & Thomas, including the existence, dissolution or continuation of said firm, and the responsibilities of the parties as it pertains to said firm at various points in time;

F. Whether Petitioner continued to hold herself out as practicing law as partner in McClure, Thomas & Thomas after the firm ceased operations;

G. Whether Petitioner has made representations about ceasing the practice of law as partner in said firm or practicing law in any capacity temporarily and the reason(s) given;

H. Whether there continues to be cases pending in which Petitioner appears as attorney of record on behalf of the firm or in her personal capacity, the identity and status of said cases, and identity of judges assigned to said cases;

I. The purpose and substance of conversations (telephone and in-person) with judges of the Circuit, including whether those conversations were proper, involved business before the court or were personal in nature;

J. Whether any potential witness has made statements about the impartiality of one or more judges of the Circuit, including the judge originally assigned to hear these matters;

K. Whether Petitioner has acted with reasonable diligence to conclude cases currently pending before one or more judges in this Circuit and, if not, the reasons given by Petitioner for any delays;

L. Whether Petitioner acted with reasonable diligence to conclude cases in which fees were owed to Petitioner/firm that concluded between May 1, 2022-October 9, 2022, and, if not, the reasons given by Petitioner and/or cause of delay;

M. The purpose, timing, and reasoning of Petitioner initiating an ex-parte conversation with the Honorable Jerry J. Hooker by outbound call on November 3, 2022, at or about 5:36 p.m. at a time of crisis involving the parties' minor son. Petitioner did not disclose the call until specifically requested by Respondent. Petitioner's disclosure to Respondent was via text, stating it was for the purpose of scheduling a conference and she discussed the hospitalization of the parties' son. The substance of the conversation has not been disclosed to Respondent to-date.

O. Petitioner has attempted to secure employment with the Menard County State's Attorney's Office and asked if the Honorable Jerry J. Hooker had any pull with "Gabe" or the Menard County Board to meet her salary demands during a conference call in this cause, which is wholly improper both in timing and substance.

5. Prior to his substitution, the Honorable Roger B. Thomson heard the Ex-Parte Emergency Petition and entered the Ex-Parte Order of Protection which was vacated. Discovery in 2022-CM-62 was provided to Respondent, which disclosed the Honorable Roger B. Thomson approved the application for the arrest warrant in 2022-CM-62. The officer who presented the application for arrest warrant reports "Judge Thompson[sic] is an independent judge **who has no prior legal or personal relationship with Luke.**" Respondent and his firm have been opposing

counsel to Judge[attorney] Thomson, Respondent and Judge [attorney] Thomson competed for associate judgeship position(s), and Petitioner and members of the parties' firm have appeared as counsel before Judge Thomson.

6. During his career of actively practicing law (2003-2019), Respondent enjoyed working with Judge Hooker as State's Attorney, private attorney and Judge, and does not intend for this motion to call Judge Hooker's integrity into question. However, it appears Judge Hooker may too be called as a potential witness on one or more of the issues raised in paragraphs 2 & 4 above.

7. Given the unique nature of these cases, the parties involved, the facts and circumstances surrounding the issues that have become known after Judge Hooker's assignment, and familiarity with potential witnesses, it would be impossible for him or any similarly situated judge to proceed without significant doubts as to impartiality, which is prejudicial not only Respondent, but also to avoid any appearance of impropriety to preserve and protect the integrity of the Courts of the Eighth Circuit.

8. *Respondent's Affidavit pursuant to statute is attached.*

WHEREFORE, Respondent, Luke A. Thomas, respectfully requests the Honorable Jerry J. Hooker enter an order transferring this cause to any convenient county outside of the Eighth Judicial Circuit wherein each pending matter can be heard by a judge unfamiliar with the parties and potential witnesses as more fully set forth in a Motion for Change of Venue; alternatively, enter an order recusing himself from each of these causes with referral and request each pending matter be assigned to judges in this Circuit who are unfamiliar with the parties and potential witnesses, and for such further relief deemed just and proper.

By: Luke A. Thomas, Respondent

By: /s/ Luke A. Thomas

Luke A. Thomas, pro se

CERTIFICATE OF SERVICE

I Luke A. Thomas, an attorney at law duly licensed to practice in the State of Illinois, do hereby certify that I electronically AMENDED MOTION FOR SUBSTITUTION FOR JUDGE in the above-entitled cause upon Defendant electronically to the electronic mailing address of record as stated below on the 20th Day of December, 2022.

Gwendolyn M. Thomas: gwenthomaslaw@gmail.com

/s/ Luke A. Thomas_____

LUKE A. THOMAS

Plaintiff

Temporary Address: 176 Trillium Lane, Springfield, IL 62707

Thomaslitigation2022@gmail.com

ARDC No.: 6279891

CIRCUIT COURT OF EIGHTH
JUDICIAL CIRCUIT, ILLINOIS
CASS COUNTY, IN PROBATE

ESTATE OF	)	
	)	
SAM L. SEWARD,	)	NO. 2021-P-9
	)	
DECEASED	)	

AFFIDAVIT IN SUPPORT OF MOTION FOR SUBSTITUTION OF JUDGE
735 ILCS 5/2-1001(a)(3)(ii)

Luke A. Thomas, pro se Respondent, being first duly sworn on oath, deposes and states:

1. I am the Respondent in the above-captioned cause(es).
2. I am forty-seven (47) years old. I permanently reside at 416 North Sylvan Street, Ashland, Cass County, Illinois.
3. I was admitted to practice law in the State of Illinois in 2002. I am licensed and authorized to practice law in the State of Illinois, United States Supreme Court, Central District of Illinois-United States District Court, Central District of Illinois-United States Bankruptcy Court, United States Social Security Administration, and have appeared pro hac vice before other tribunals during my career. I am in good standing with all courts in which I am licensed to practice.
4. With the exception of any minor traffic offense(s) occurring years ago, I have no criminal history whatsoever and have been a law-abiding citizen my whole life.
5. Any allegation of fact contained in the Motion to which this Affidavit is either attached or submitted in support thereof are verily believed to be true and if called as a witness, I could competently testify to the veracity, except as to matters which are not in my direct knowledge and to such matters, I verily believe the same to be true.

6. The correspondence(s) attached hereto are true and correct copies of electronic correspondence sent on behalf and through the firm of McClure, Thomas & Thomas by Gwendolyn M. Thomas, a partner in the firm and authorized User-level user of the Firm's electronic mail and domain servers. The undersigned further states such records are not only true and correct, but were retained in the ordinary course of business of the Firm and therefore meet the business records exception to the hearsay rule.

7. The pleadings and motions attached to this affidavit to represent the judicial admissions made to various courts in the Eighth Circuit during the referenced time-period are true and correct copies of the records maintained by the law firm of McClure, Thomas & Thomas and are verily believed to be identical as submitted to the court(s) contained in the captions set forth thereon.

8. The undersigned practiced law throughout the Eighth Judicial Circuit, Morgan County, and Sangamon County in various and numerous cases from 2003-2019. .

9. Petitioner has practiced law throughout the Eighth Judicial Circuit, Morgan County, and Sangamon County in various and numerous cases from 2006-present.

10. Upon information and belief, Petitioner continues to appear as attorney of record on behalf of the Firm of McClure, Thomas & Thomas presently in one or more counties in the Eighth Judicial Circuit.

11. Further your affiant sayeth not.

Under penalties as provided by law pursuant to Section 1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the statements set forth in the foregoing instrument are true and correct, except as to matters therein stated to be on information and belief, and as to such matters, the undersigned certifies aforesaid that I verily believe the same to be true. I further state that the statements made in the foregoing Affidavit as to want of knowledge sufficient to form a belief are true.

/s/ Luke A. Thomas

LUKE A. THOMAS

LUKE A. THOMAS, Pro Se

RESPONDENT

Temporary Address: 176 Trillium Lane, Springfield, IL 62707

P. 217-210-1430

E. thomaslitigation2022@gmail.com

ARDC No. 6278591

(no subject)

7 messages

Gwendolyn Thomas <gwendolynthomas@mcclurethomaslaw.com>

Sun, Feb 21, 2021 at 9:46 AM

To: "Geselbracht, Thomas F." <Thomas.Geselbracht@dlapiper.com>, Jerry Hooker <jerryjhooker@gmail.com>

Judge and Counsel,

I have been dealing with significant personal issues and am requesting a continuance of this week's call. While I will eventually disclose the nature of these issues, I am currently not wanting my personal issues to become public.

Sincerely,

Gwendolyn M. Thomas
McClure, Thomas & Thomas
113 S. State Street
P.O. Box 170
Beardstown, IL 62618
Tel: (217) 323-2211
Fax: (217) 323-5522
Web: www.mcclurethomaslaw.com

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Geselbracht, Thomas F. <thomas.geselbracht@dlapiper.com>

Sun, Feb 21, 2021 at 11:21 AM

To: Gwendolyn Thomas <gwendolynthomas@mcclurethomaslaw.com>, Jerry Hooker <jerryjhooker@gmail.com>

Under the circumstances, I don't object to a short continuance.

Get [Outlook for iOS](#)

From: Gwendolyn Thomas <gwendolynthomas@mcclurethomaslaw.com>

Sent: Sunday, February 21, 2021 8:46:11 AM

To: Geselbracht, Thomas F. <Thomas.Geselbracht@us.dlapiper.com>; Jerry Hooker <jerryjhooker@gmail.com>

Subject:

[EXTERNAL]

[Quoted text hidden]

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Jerry Hooker <jerryjhooker@gmail.com>
To: "Geselbracht, Thomas F." <thomas.geselbracht@dlapiper.com>
Cc: Gwendolyn Thomas <gwendolynthomas@mcclurethomaslaw.com>

Sun, Feb 21, 2021 at 4:19 PM

That's fine with me . We will reschedule. JJ Hooker

Sent from my iPhone

[Quoted text hidden]

Gwendolyn Thomas <gwendolynthomas@mcclurethomaslaw.com>

Sun, Mar 7, 2021 at 10:25 AM

To: Jerry Hooker <jerryjhooker@gmail.com>
Cc: "Geselbracht, Thomas F." <thomas.geselbracht@dlapiper.com>

All,

My husband and I have been having marital issues and discussed dissolving our marriage and general partnership. As you may be aware, I have been the only one working outside the home and it has taken a toll. We are trying to work through things and get on the same page. While I have not wanted this information disclosed, it undoubtedly has impacted my ability to focus on work.

Subsequently, our 12 year old son, Grant, started having blood in his stool and rectal bleeding, which symptoms presented just like my husband's did when he was diagnosed with rectal cancer. Grant has seen a pediatric gastroenterologist and had a colonoscopy last week. The results were good - no polyps, hemorrhoids or mass - but there was a "rectal nodularity". Biopsies did not indicate cancer, thank the Lord, but the dr is still trying to determine the source of the bleeding. So far, he has not become anemic. Grant is also a Type 1 diabetic, so whatever issues are going on, are causing tremendous spikes in his blood sugar. A certain type of abdominal scan is being ordered for this coming week to see if he has Merck's diverticulum. We have not been advised of the date or time of the scan. If Grant has Merck's diverticulum, he would likely need to have a portion of his colon removed and resected. If it is not Merck's diverticulum, and maybe even if it is, we may take Grant to Mayo for evaluation. We have been in contact with Luke's GI team and forwarded them Grant's medical reports, so they would consider seeing him as a patient.

I have a lot on my plate at this moment and ensuring my son receives the best possible medical care is my top priority. I will certainly keep you all posted. In the meantime, all my cases are being stagnated and I apologize.

[Quoted text hidden]

[Quoted text hidden]

Jerry Hooker <jerryjhooker@gmail.com>
To: "Geselbracht, Thomas F." <thomas.geselbracht@dlapiper.com>
Cc: Gwendolyn Thomas <gwendolynthomas@mcclurethomaslaw.com>

Sun, Mar 7, 2021 at 3:03 PM

Gwen, I'm so sorry to hear what you are going through. Obviously you need to continue to put your family first and work will just have to adapt. You and tom can talk when able and let me know what works best for everyone. Take care . JJ Hooker

Sent from my iPhone

On Mar 7, 2021, at 7:40 AM, Geselbracht, Thomas F. <thomas.geselbracht@dlapiper.com> wrote:

Is there a new date for a status?

Thomas F. Geselbracht

Senior Counsel

DLA Piper LLP (US)

444 West Lake Street, Suite 900

Chicago, Illinois 60606

Phone: (312) 368-4094

Fax: (312) 630-7348

Thomas.Geselbracht@US.DLAPiper.com

From: Jerry Hooker <jerryjhooker@gmail.com>
Sent: Sunday, February 21, 2021 4:20 PM
To: Geselbracht, Thomas F. <Thomas.Geselbracht@us.dlapiper.com>
Cc: Gwendolyn Thomas <gwendolynthomas@mcclurethomaslaw.com>
Subject: Re:

[EXTERNAL]

[Quoted text hidden]

[Quoted text hidden]

Geselbracht, Thomas F. <thomas.geselbracht@dlapiper.com>
To: Gwendolyn Thomas <gwendolynthomas@mcclurethomaslaw.com>

Fri, Apr 16, 2021 at 9:41 AM

Gwen:

I hope things have improved for you. I don't want to put any pressure on you, but I need to let my client know what the status of this matter is. Can you let me know where you and the plaintiffs stand on all this? Are we going to put the "stay-in-place" tolling agreement in place, or resume the litigation?

Thanx.

Thomas F. Geselbracht

Senior Counsel

DLA Piper LLP (US)

444 West Lake Street, Suite 900

Chicago, Illinois 60606

Phone: (312) 368-4094

Fax: (312) 630-7348

Thomas.Geselbracht@US.DLAPiper.com

Sergeant French contacted Sheriff Ohrn again to explain the easiest way to employ additional resources including local agencies and sheriff's offices would be to seek a warrant from Judge Thompson. At 2:00 p.m., Sheriff Ohrn and Sergeant French spoke with Cass County States Attorney and Judge Thompson drafted an Arrest Warrant and arranged a meeting for Sergeant French to meet with Judge Thompson at the Mason County Courthouse. Judge Thompson is an independent judge with no financial or personal relationship with Luke.

adequate law enforcement
from a judge. At approximately
(SA) Craig Miller. SA Miller
Honorable Judge Roger
ge who has no previous legal

Luke A. Thomas

Electronic Mailing Address:

thomaslitigation2022@gmail.com

Phone: 217.210.1430

****Amendments in Bold and
Italicized***

*Original request date: September 21, 2022
Amended October 1, 2022*

Sheriff Devron Ohrn
Deputy Sheriff Terry Comiskey
Mr. John David Osmer
Mrs. Georgeanne Osmer
Mr. John David Osmer, II
Mrs. Jessica J. Dour a/k/a Jessica J. Osmer
Mrs. Gwendolyn Thomas

Mr. Jack Fearneyhough Mrs.
Marti Fearneyhough
Mr. Steven L Daniel
ISP Master Sargent ***Brice*** Hager
ISP Trooper First Class Aaron French
Cass County Sheriff's Office
Sangamon County Sheriff's Office

Re: Notice to Preserve Tangible and Electronic Evidence

Dear Ladies and Gentlemen:

Please take notice you have or may be named as a defendant in lawsuit(s) arising from your acts or omissions arising from the events leading up to and following the removal of my person and property on or about September 12, 2022 and events occurring thereafter through at least the date of this notice. Electronically stored information would include, but not limited to, electronic mail, telephone records, text messages, pictures, warrant applications, recordings, deposits, credit card statements, and any other record, electronically stored ***or otherwise in your possession, control or available to you.*** (hereinafter "records" or "evidence").

Additionally, you must preserve all social media posts, comments, messages, photographs, videos, search history, originated or received by you through Facebook, Facebook Messenger, Instagram, Twitter, or any other social media platform with similar capabilities of generating and storing electronic data, for all primary and secondary accounts you own, use or to which you have access. These materials, together with the materials referenced in the preceding paragraph, are collectively considered "records" or "evidence" as well.

Additionally, said records may constitute evidence in any suit brought by or against the undersigned and are material to all matters arising out of the events referenced above. Said time period and duty shall include any and all records in existence from November 1, 2021, and continuing in perpetuity until said notice is terminated in writing. ***Upon information and belief, said electronically stored material may evidence commission of civil or criminal misconduct by one or more of the individuals name above and should be preserved to prevent furtherance of such misconduct and aid in the administration of justice.***

Said materials are discoverable under Federal Rules of Civil Procedure (Rule 26), and this request meets all requirements under State law. If there are any costs associated with the preservation of such records/evidence, please promptly inform the same in writing at the electronic mailing address provided above so that reasonable compensation may be provided when warranted.

Sincerely,

By



Luke A. Thomas

***Courtesy Copies: Deputy Director's Office
Colonel Akil Smith
Lieutenant Col. Isaiah Vega***

(no subject)

4 messages

Gwendolyn Thomas <gwendolynthomas@mcclurethomaslaw.com>

Mon, Nov 22, 2021 at 11:01 AM

To: Timothy Wessel <casscountyjudge@gmail.com>, Judge Escapa <r.escapa@schuylercounty.org>, Judge Roger Thomson <rbthom8750@gmail.com>, Judge Michael Atterberry <matterberry@co.menard.il.us>, Jerry Hooker <jerryjhooker@gmail.com>, Judge Tippey <ktippey@co.menard.il.us>, fmccartney@pikecountyil.org

Judges,

This will serve to let you know that I have made the difficult decision to close my office. I want you to hear "the news" from me, rather than through the rumor mill. The ongoing health issues in my family are such that I can no longer fulfill my professional obligations in the time and manner in which my clients deserve. At this point, I need to be home to care for my family. Over the next several weeks, I will be finalizing the matters that are able to be completed and seeking to withdraw from others. There will be a few carryover cases that I will finalize after the first of the year. I appreciate your patience with me and any courtesies extended over the last couple of years. It has been a difficult road for my entire family and your graciousness has made it a bit easier.

I plan to return to the practice once I have the ability to focus and adhere to the level of professionalism I expect of myself.

If you need to get in touch with me for any reason, please reach me on my cell (217) 370-0141.

Sincerely,

Gwendolyn M. Thomas
McClure, Thomas & Thomas
113 S. State Street
P.O. Box 170
Beardstown, IL 62618
Tel: (217) 323-2211
Fax: (217) 323-5522
Web: www.mcclurethomaslaw.com

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Gwendolyn Thomas <gwendolynthomas@mcclurethomaslaw.com>

Mon, Nov 22, 2021 at 11:02 AM

To: Luke Thomas <lukethomas@mcclurethomaslaw.com>

FYI

[Quoted text hidden]

Mike Atterberry <matterberry@co.menard.il.us>

Mon, Nov 22, 2021 at 11:14 AM

To: Gwendolyn Thomas <gwendolynthomas@mcclurethomaslaw.com>

Thoughts and prayers will be with you during this difficult and trying period

From: Gwendolyn Thomas [mailto:gwendolynthomas@mcclurethomaslaw.com]

Sent: Monday, November 22, 2021 11:02 AM

To: Timothy Wessel <casscountyjudge@gmail.com>; Judge Escapa <r.escapa@schuylercounty.org>; Judge Roger Thomson <rbthom8750@gmail.com>; Mike Atterberry <matterberry@co.menard.il.us>; Jerry Hooker <jerryhooker@gmail.com>; Kevin Tippey <ktippey@co.menard.il.us>; fmccartney@pikecountyil.org

Subject:

CAUTION: This email is from an external source. **WARNING:** Be careful when clicking on links or opening attachments.

[Quoted text hidden]

Kevin Tippey <ktippey@co.menard.il.us>

Mon, Nov 22, 2021 at 12:44 PM

To: Gwendolyn Thomas <gwendolynthomas@mcclurethomaslaw.com>

Sorry it has reached this point. Prayers for you all.
KDT

Sent from my iPad

On Nov 22, 2021, at 11:02 AM, Gwendolyn Thomas <gwendolynthomas@mcclurethomaslaw.com> wrote:

CAUTION: This email is from an external source. WARNING: Be careful when clicking on links or opening attachments.

Judges,

This will serve to let you know that I have made the difficult decision to close my office. I want you to hear "the news" from me, rather than through the rumor mill. The ongoing health issues in my family are such that I can no longer fulfill my professional obligations in the time and manner in which my clients deserve. At this point, I need to be home to care for my family. Over the next several weeks, I will be finalizing the matters that are able to be completed and seeking to withdraw from others. There will be a few carryover cases that I will finalize after the first of the year. I appreciate your patience with me and any courtesies extended over the last couple of years. It has been a difficult road for my entire family and your graciousness has made it a bit easier.

I plan to return to the practice once I have the ability to focus and adhere to the level of professionalism I expect of myself.

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Sincerely,

Gwendolyn M. Thomas
McClure, Thomas & Thomas
113 S. State Street
P.O. Box 170
Beardstown, IL 62618
Tel: (217) 323-2211
Fax: (217) 323-5522
Web: www.mcclurethomaslaw.com<<http://www.mcclurethomaslaw.com>>

[Quoted text hidden]

IRMO Kurfman (Schuyler County Case No. 08-D-29)

1 message

Gwendolyn Thomas <gwendolynthomas@mcclurethomaslaw.com>

Tue, Nov 2, 2021 at 12:23 PM

To: Judge Roger Thomson <rbthom8750@gmail.com>, Jess Gilsdorf <gilsdorf@casscomm.com>, Dustin Clark <dustin@clarkandjoneslaw.com>

Judge Thomson,

Attached is a courtesy copy of the Petition for Modification filed on October 26, 2021, in the above-referenced matter. Attorney Clark previously filed a Petition for Attorney's Fees. Would you please give us potential hearing dates/times on the pending matters?

Sincerely,

Gwendolyn M. Thomas
McClure, Thomas & Thomas
113 S. State Street
P.O. Box 170
Beardstown, IL 62618
Tel: (217) 323-2211
Fax: (217) 323-5522
Web: www.mcclurethomaslaw.com

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Harsy Dacia Petition for Modification of Parenting Time and Parental Responsibilities filed 10-26-21.pdf
119K

Logue v Koehler

3 messages

Brooke Walker <brookew@stangelawfirm.com>
To: gwendolynthomas@mcclurethomaslaw.com

Mon, Dec 13, 2021 at 4:44 PM

Hello again Mrs. Thomas,

Attached is a Motion for Substitution of Counsel, if you could please sign it and return it as soon as possible that would be appreciated. If you have any questions, please feel free to contact us.

Thanks,
Brooke

--



Brooke Walker | Legal Assistant

T: (217) 717-8605

E: brookew@stangelawfirm.com

W: www.stangelawfirm.com



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Motion for Substitution of Counsel
208K

Brooke Walker <brookew@stangelawfirm.com>
To: gwendolynthomas@mcclurethomaslaw.com

Mon, Dec 20, 2021 at 2:44 PM

Hello Mrs. Thomas,

I was just following up on this Substitution and wondering if you could sign it and return it with in the next day or two.

Thanks,
Brooke



Brooke Walker | Legal Assistant

T: (217) 717-8605

E: brookew@stangelawfirm.com

W: www.stangelawfirm.com



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[Quoted text hidden]

Gwendolyn Thomas <gwendolynthomas@mcclurethomaslaw.com>

Mon, Dec 20, 2021 at 6:18 PM

To: Brooke Walker <brookew@stangelawfirm.com>

I am in the process of winding down my firm and closed on the building today. Mr. Logue received a copy of all documents when so represented him. I do not have any other documents.

The case I was involved in concluded. There is no need for a substitution of counsel. In fact, it is not even required nor common practice in our circuit under these circumstances.

The attorney in your office can simply file whatever pleadings to initiate a cause of action. Or enter an appearance if there are pending pleadings.

Best of luck,

Gwen

[Quoted text hidden]

--

Sincerely,

Gwendolyn M. Thomas
McClure, Thomas & Thomas
113 S. State Street
P.O. Box 170
Beardstown, IL 62618
Tel: (217) 323-2211
Fax: (217) 323-5522
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IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL
CIRCUIT OF ILLINOIS, BROWN COUNTY, ILLINOIS

DAVID LEIGHTON KURFMAN,	)	
	)	
Petitioner,	)	
	)	
v.	)	NO. 2021-OP-23
	)	
DACIA LYNN HARSY,	)	
	)	
Respondent.	)	

MOTION FOR LEAVE TO WITHDRAW AS ATTORNEY FOR RESPONDENT

Now comes Gwendolyn M. Thomas, individually and on behalf of the firm of McClure, Thomas & Thomas, attorneys of record for your Respondent, Dacia Lynn Harsy, and for this Motion for Leave to Withdraw as Attorney for Respondent, states:

1. The undersigned and this firm are the attorneys of record for your Respondent, Dacia Lynn Harsy.
2. The last known address for Dacia Lynn Harsy is 1717 N. Reed Station Road, Carbondale, Illinois 62901.
3. The undersigned is unable to assist your Respondent any further in this proceeding due to personal issues involving her family, such that the undersigned can no longer dedicate the necessary time to effectively represent her interests. Additionally, the undersigned is closing the firm.
4. It is just and proper for this Court to allow the undersigned and her firm to withdraw as attorneys of record for Dacia Lynn Harsy herein.
5. Dacia Lynn Harsy is hereby put on notice that if the Court allows the undersigned and her firm to withdraw as attorneys of record for her, she should retain other counsel to represent her interests in this cause, or file with the Clerk of the Court, within 21 days

after entry of the Order for Leave to Withdraw, her supplemental appearance stating therein addresses for which service of notices or other papers may be had upon her.

6. Service of this Motion and Notice of Hearing on this Motion has or will be accomplished in accordance with Supreme Court Rule 13.

WHEREFORE, the undersigned respectfully requests this Honorable Court to enter an Order granting the undersigned and her firm leave to withdraw as attorneys of record for the Respondent, and for such further relief this Honorable Court deems just and proper.

McCLURE, THOMAS & THOMAS
Attorneys for Dacia Lynn Harsy,
Respondent

By: /s/ Gwendolyn M. Thomas

McCLURE, THOMAS & THOMAS
Attorneys for Respondent
113 State Street, P.O. Box 170
Beardstown, IL 62618-0170
Telephone: (217) 323-2211
Email: gwendolynthomas@mcclurethomaslaw.com
Attorney No.: 6290392

IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL
CIRCUIT OF ILLINOIS, SCHUYLER COUNTY, ILLINOIS

IN RE:)
)
THE MARRIAGE OF)
)
DAVID KURFMAN) NO. 08-D-29
)
Petitioner,)
)
AND)
)
DACIA KURFMAN, n/k/a DACIA HARSY)
)
Respondent.)

MOTION FOR LEAVE TO WITHDRAW AS ATTORNEY FOR RESPONDENT

Now comes Gwendolyn M. Thomas, individually and on behalf of the firm of McClure, Thomas & Thomas, attorneys of record for your Respondent, Dacia Lynn Harsy, and for this Motion for Leave to Withdraw as Attorney for Respondent, states:

1. The undersigned and this firm are the attorneys of record for your Respondent, Dacia Lynn Harsy.
2. The last known address for Dacia Lynn Harsy is 1717 N. Reed Station Road, Carbondale, Illinois 62901.
3. The undersigned is unable to assist your Respondent any further in this proceeding due to personal issues involving her family, such that the undersigned can no longer dedicate the necessary time to effectively represent her interests. Additionally, the undersigned is closing the firm.
4. It is just and proper for this Court to allow the undersigned and her firm to withdraw as attorneys of record for Dacia Lynn Harsy herein.
5. Dacia Lynn Harsy is hereby put on notice that if the Court allows the

undersigned and her firm to withdraw as attorneys of record for her, she should retain other counsel to represent her interests in this cause, or file with the Clerk of the Court, within 21 days after entry of the Order for Leave to Withdraw, her supplemental appearance stating therein addresses for which service of notices or other papers may be had upon her.

6. Service of this Motion and Notice of Hearing on this Motion has or will be accomplished in accordance with Supreme Court Rule 13.

WHEREFORE, the undersigned respectfully requests this Honorable Court to enter an Order granting the undersigned and her firm leave to withdraw as attorneys of record for the Respondent, and for such further relief this Honorable Court deems just and proper.

McCLURE, THOMAS & THOMAS
Attorneys for Dacia Lynn Harsy,
Respondent

By: /s/ Gwendolyn M. Thomas

McCLURE, THOMAS & THOMAS
Attorneys for Respondent
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