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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
MUNICIPAL DEPARTMENT, FIRST DISTRICT

ROBERT MORE, *et al.*,

Plaintiffs,

v.

CITY OF CHICAGO, *et al.*,

Defendants.

No. 11 M1 12530

FILED-60
12 APR 27 PM 2:02
CIRCUIT COURT OF COOK COUNTY
MUNICIPAL DEPARTMENT
CHICAGO, ILLINOIS

NOTICE OF MOTION

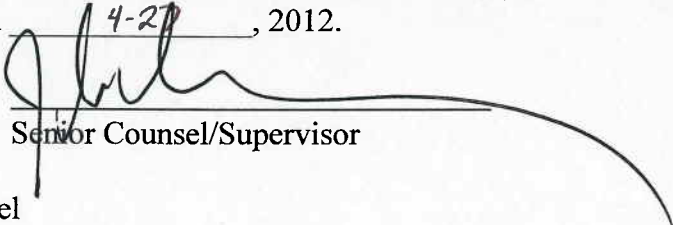
To: Robert More
P.O. Box 6926
Chicago, IL 60680
E-Mail: Anselm45@gmail.com

On 5-9-2012 at 1:30 p.m., or as soon thereafter as counsel may be heard, an attorney for the City of Chicago shall appear before the Honorable Judge *Presiding* in courtroom 1401 of the Richard J. Daley Center, Chicago, Illinois, to present the attached **DEFENDANT CITY OF CHICAGO'S MOTION FOR RULE TO SHOW CAUSE WHY THE PLAINTIFF, ROBERT MORE, SHOULD NOT BE HELD IN CONTEMPT.**

CERTIFICATE OF SERVICE

I certify, under penalties provided by law pursuant to Section 1-109 of the Code of Civil Procedure, that I served the attached document to each party to whom it is addressed, on 4/9/12 by:

- by email to the Plaintiff at his E-Mail address, Anselm45@gmail.com; and
- by depositing a copy of it in a receptacle of the United States Mail, proper postage pre-paid, before 5:00 p.m. on 4-27, 2012.


Senior Counsel/Supervisor

Stephen R. Patton, Corporation Counsel
John H. Ehrlich, Deputy Corporation Counsel
John M. Leovy, Senior Counsel/Supervisor
30 N. LaSalle St., Ste. 800
Chicago, IL 60602
Tel. 312-744-7150
Fax. 312-744-1974
Attorney No. 90909

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
MUNICIPAL DEPARTMENT, FIRST DISTRICT**

ROBERT MORE, et al.,)
)
Plaintiff,)
)
v.)
)
The CITY OF CHICAGO, et al.,)
)
Defendants.)

No. 11 M1 12530

FILED-60
12 APR 27 PM 2:02
CIRCUIT COURT OF COOK COUNTY
MUNICIPAL DEPARTMENT
DOMINICK P. DAN
CLERK

**DEFENDANT CITY OF CHICAGO'S MOTION FOR RULE TO SHOW CAUSE
WHY THE PLAINTIFF, ROBERT MORE, SHOULD NOT BE HELD IN CONTEMPT**

Robert More has violated this Court's order of April 16, 2012. His violation is willful. The court should issue order Mr. More to appear and show cause why it should not hold him in contempt.

BACKGROUND

On October 28, 2011, the Court dismissed the City of Chicago and all its agents from this case. *Exhibit ("Ex.") 1*. The Court entered judgment in favor of the City.

More later argued that he filed a motion to reconsider. However, he did not serve that motion on the City, and did not provide a copy to the Court.

On March 6, 2012, this Court entered an order compelling More to serve a copy of his motion to reconsider on the City at its office address of 30 N. LaSalle, Suite 800, Chicago. *Ex. 2*.

In e-mail messages to the undersigned, More acknowledged that he had filed a motion but refused to provide a copy to the City as this Court ordered. *Ex. 3*. Said More:

I have found the M[otion] T[o] R[econsider] but am waiting to email it to you until after you explain why I should be put so such burden since I already delivered it to a City of Chicago point of

public access - what is the justification for still another burden shifting ploy? Also, what are the email addresses of Megan McGrath and Jeffrey Givens - I am committed to procure the consideration equivalent to a criminal conviction and tort damages against these cannibals.

Ex. 3.

On April 16, 2012, this Court granted the City's motion for sanctions pursuant to Supreme Court Rule 219(c). *Ex. 4.* The sanction included an order compelling Mr. More to pay to the City of Chicago the sum of \$300.00 within 7 days, and barring him from filing any other papers in this case until he has done so.

The undersigned demanded payment. *Ex. 5.* More refused to comply, arguing in an email to the undersigned as follows:

It is the informed understanding of Robert J. More that RJM lacks the authority to remit as much as one cent to the City of Chicago ("Chicago") in regard to the matters this email concerns and RJM herein dishonors the presentment contained in the letter attached to this email.

Ex. 6. To date, More has not complied with the order to pay \$300.00 to the City.

ARGUMENT

Courts have broad power to ensure that their orders are followed. *People v. Warren*, 173 Ill.3d 348, 368 (1996). When a party wilfully fails to comply with an order, he may be held in contempt. *Santiago v. E.W. Bliss & Co.*, 406 Ill. App. 3d 449, 453 (1st Dist. 2010).

Illinois law recognizes two forms of contempt: civil and criminal. *Id.* Civil contempt is "a sanction or penalty designed to compel future compliance with a court order." *Felzak v. Hruby*, 226 Ill. 2d 382, 391 (2007). In contrast, criminal contempt "is retrospective in nature and consists of punishing for doing what has been prohibited or not doing what has been ordered."

Levaccare v. Levaccare, 376 Ill. App. 3d 503, 509 (1st Dist. 2007).

Contempt of a court's order may be either direct or indirect. "A direct contempt is a contempt committed in the presence of the court while the court is in session, as opposed to an indirect contempt that is committed outside the presence of the court." *Id.*

In this case, Mr. More has committed indirect civil contempt by wilfully refusing to comply with the Court's April 16, 2012 order to pay the City of Chicago the \$300.00 sanction. More's refusal occurred outside the presence of the court, and it is wilful in nature. More acknowledged the existence of the order and yet refused to pay, because he "lacks the authority to remit as much as one cent to the City of Chicago." *Ex. 6*. By stating that he "lacks the authority" to comply with the Court's order, More is wilfully challenging the Court's authority. He should be required to show cause why the Court should not find him in indirect civil contempt.

CONCLUSION

Because More has wilfully violated the Court's April 16, 2012 order, the Defendant, the City of Chicago, respectfully requests that the Court enter an order providing it with the following relief:

1. Entry of an order compelling the Plaintiff, Robert More, to appear in open court on a certain date and at a certain time to show cause why he should not be held in indirect civil contempt for his wilful violation of the Court's April 16, 2012 order;
2. Should More fail to appear or appear and yet fail to show such cause, entry of a coercive order designed to bring Mr. More into compliance with its orders and respect its authority, as the Court deems necessary and just; and
3. Entry of judgment in favor of the Defendant, the City of Chicago, and against the

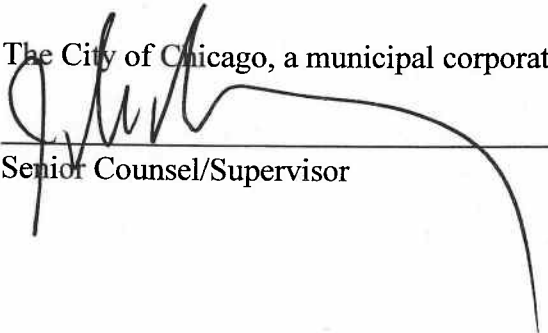
Plaintiff, Robert More, on the Court's April 16, 2012 award of sanctions in the amount of \$300.00.

Date: April 27, 2012

Respectfully submitted,

The City of Chicago, a municipal corporation

By:


Senior Counsel/Supervisor

Stephen R. Patton, Corporation Counsel
John H. Ehrlich, Deputy Corporation Counsel
John M. Leovy, Senior Counsel/Supervisor
30 North LaSalle Street, Suite 800
Chicago, Illinois 60602
Tel.: 312/744-7150
Fax: 312-744-1974
Attorney No. 90909

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS



ROBERT MORE

v.

CITY OF CHICAGO

No. 11 MI 12530

ORDER

THIS MATTER HAVING COME BEFORE THE COURT ON THE DEFENDANT CITY OF CHICAGO'S MOTIONS (1) TO GRANT OR STRIKE PLAINTIFF'S MOTION TO DISMISS VOLUNTARILY, (2) FOR A RULE 201 (C) (1) PROTECTIVE ORDER, (3) TO STRIKE AND DISMISS PLAINTIFF'S AMENDED COMPLAINT PER 735 ILCS 5/2-619.1, ALL PARTIES THAT HAVE BEEN SERVED BEING PRESENT IN OPEN COURT AND THE COURT HAVING CONDUCTED A HEARING ON THE MERITS, IT IS HEREBY ORDERED:

1) DEFENDANT'S MOTION TO STRIKE IS GRANTED AND PLAINTIFF'S MOTION TO VOLUNTARILY DISMISS THIS CASE IS STRICKEN;

2) DEFENDANT'S MOTION FOR ENTRY OF A RULE 201 (C) (1) PROTECTIVE ORDER IS GRANTED, AND PLAINTIFF'S DISCOVERY REQUEST FOR THE NAMES OF "ALL SERGANTS AND ABOVE IN THE 14TH DISTRICT" AND ANY SIMILAR DISCOVERY REQUEST IS STRICKEN, AND PLAINTIFF IS HEREOFORWARD BARRED FROM SENDING ABUSIVE EMAILS OR ANY OTHER FORM OF ABUSIVE COMMUNICATION TO ANY ATTORNEY PRACTICING IN THIS COURT. AND (3) ALL JURY FEE DTS ARE DISMISSED AS 735 ILCS 5/2-619 WITH INTEREST

Atty. No.: 90909

Name: PATTON/EHRICH/LEVY

ENTERED:

(SEE ONE OF THEM)

Atty. for: CITY OF CHICAGO

Dated:

Address: 30 N. LA SALLE, SUITE 800

City/State/Zip: CHICAGO IL 60602

Judge

Judge's No.

Telephone: 312-744-7150

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

PAGE TWO
OF TWO

ROBERT MORE

v.

CITY OF CHICAGO

No. 11 MI 12530

ORDER

AND THIS ~~AND~~ CASE IN ITS ENTIRETY IS DISMISSED WITH PREJUDICE ON THE BASIS OF 735 ILCS 5/2-613, BECAUSE THE ALLEGATIONS AND FACTS PLEADED BY PLAINTIFF CAN NEVER STATE A CAUSE OF ACTION;

④ JUDGMENT IS HEREBY ENTERED IN FAVOR OF THE DEFENDANT, THE CITY OF CHICAGO, AND AGAINST THE ~~PLAINTIFF~~ PLAINTIFF, ROBERT MORE; AND

⑤ THE COURT DID NOT REVIEW THE DOCUMENTS PURPORTEDLY FILED BY THE PLAINTIFF, ROBERT MORE

⑥ THE COURT REFUSED TO RECALL THE CASE HAVING HEARD OVER 30 MINUTES OF ARGUMENT ON THESE MATTERS.

Atty. No.: 90909

Name: PATTON/EHRlich / LEVY

ENTERED:

Atty. for: CHICAGO

Address: 30 N. LA SALLE, SUITE 800

Dated: Judge Laurence J. Dunford

City/State/Zip: CHICAGO IL 60602

OCT 28 2011

Telephone: 312 744 7150

Circuit Court - 1877
Judge Judge's No.

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

EXHIBIT
2

MORE

v.

No. 11 MI 12530

CHICAGO, ET AL.

ORDER

THIS MATTER HAVING COME BEFORE THE COURT FOR STATUS FOLLOWING THE S.O.J. FILED BY PLAINTIFF FROM JUDGE SNYDER WITH BOTH PLAINTIFF AND COUNSEL FOR THE CITY OF CHICAGO BEING PRESENT IN COURT, AND THE COURT BEING ADVISED IN THE PREMISES, IT IS HEREBY ORDERED:

- ① PLAINTIFF ROBERT MORE SHALL SERVE ON THE CITY OF CHICAGO A COPY OF HIS MOTION TO RECONSIDER AT THE ADDRESS LISTED IN HIS APPEARANCE, SPECIFICALLY, 30 N. LA SALLE SUITE 800, CHICAGO, IL 60602, WITHIN 7 DAYS OR BEFORE MARCH 13, 2012, AND
- ② THIS MATTER IS SET FOR STATUS ON APRIL 11, 2012, AT 2:00 P.M. IN COURTROOM 1401 FOR STATUS.

Atty. No.: 90909
 Name: PATTON/EARLICH/LEDVY
 Atty. for: CHICAGO
 Address: 30 N. LA SALLE # 800
 City/State/Zip: CHICAGO IL 60602
 Telephone: 312-341-7150

ENTERED:

Dated: Judge Patrick J. Sherlock
MAR - 6 2012
 Judge Circuit Court - 1942 Judge's No. _____

re More v Rojas, City of Chicago (Institutionalized Cannibalism Entity), et al

Robert More [anselm45@gmail.com]

Sent: Thursday, March 15, 2012 5:06 PM

To: Leovy, John



Mr. Leovy - i found the MTR but am waiting to email it to you until after you explain why i should be put to such burden since i already delivered it to a City of Chicago point of public access - what is the justification for still another burden shifting ploy?
also what are the email addresses of Megan McGrath and Jeffrey Givens - i am committed to procure the consideration equivalent to a criminal conviction and tort damages against these cannibals.
RJM

--

Robert J. More - non-unempathetic, non-unconcerned, non-ungrateful,
petitioner for a reprieve from the ordeal of continued earthly
existence resolved to do whatever has to be done to procure such type
reprieve, if such can be procured, as soon as it can be procured
-atrocious avengement/disaster aversion/catastrophic loss
prevention, non-expert - still in search of the mentor needed to get all of not yet completely covered
knowledge grids covered
Anselm45@Gmail.com
*AAA-ISMA Branch #4 *
*<http://thirstforjustice.tripod.com> <<http://thirstforjustice.tripod.com/>>

Re: re More v Rojas, City of Chicago (Institutionalized Cannibalism Entity), et al

Robert More [anselm45@gmail.com]

Sent: Thursday, April 05, 2012 5:57 AM

To: Leovy, John

since no answer to the question has been provided, no MTR will be provided - will you sign a statement under penalty of perjury that you never received it?

RJM

On Wed, Apr 4, 2012 at 3:43 PM, Leovy, John <John.Leovy@cityofchicago.org> wrote:

Dear Mr. More,

In response to this query, attached please find another copy of the order Judge Sherlock entered on March 6, 2012. I provided you with a copy in the courtroom, so this is the second copy of the order that I have given you.

Sincerely,

John M. Leovy

From: Robert More [anselm45@gmail.com]

Sent: Thursday, March 15, 2012 5:06 PM

To: Leovy, John

Subject: re More v Rojas, City of Chicago (Institutionalized Cannibalism Entity), et al

Mr. Leovy - i found the MTR but am waiting to email it to you until after you explain why i should be put to such burden since i already delivered it to a City of Chicago point of public access - what is the justification for still another burden shifting ploy?

also what are the email addresses of Megan McGrath and Jeffrey Givens - i am committed to procure the consideration equivalent to a criminal conviction and tort damages against these cannibals.

RJM

--

Robert J. More - non-unempathetic, non-unconcerned, non-ungrateful, petitioner for a reprieve from the ordeal of continued earthly existence resolved to do whatever has to be done to procure such type reprieve, if such can be procured, as soon as it can be procured -atrocious avengement/disaster aversion/catastrophic loss prevention, non-expert - still in search of the mentor needed to get all of not yet completely covered knowledge grids covered

Anslem45@Gmail.com

*AAA-ISMA Branch #4 *

*<http://thirstforjustice.tripod.com> <<http://thirstforjustice.tripod.com/>>

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Robert J. More - non-unempathetic, non-unconcerned, non-ungrateful,
petitioner for a reprieve from the ordeal of continued earthly
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Anselm45@Gmail.com
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*<http://thirstforjustice.tripod.com> <<http://thirstforjustice.tripod.com/>>

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

EXHIBIT
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4

Robert More, et al

v.

City of Chicago, et al

No. 11 MI 12520

ORDER

This cause coming to be heard on ~~status of~~ City of Chicago's Motion for Rule 219(c) Sanctions against the Plaintiff IT IS HEREBY ORDERED:

- (1) Defendants motion for Sanctions is granted
- (2) Plaintiff, Robert More, is ordered to pay the City of Chicago \$300.00 made payable to the City of Chicago by valid personal, cashier's, or bank check within 7 days.
- (3) Plaintiff is barred from filing any pleading, motion, or other paper with this Court until the terms of this Sanction order have been complied with in full.

Atty. No.: 90909

Name: Todd M. Hill

ENTERED:

Atty. for: City of Chicago

Dated: Bridge Plaza, World Bldg, IL

Address: 30 N. LaSalle #800

APR 17 2002

City/State/Zip: Chicago, IL 60602

Judge Circuit Court - 135 Judge's No.

Telephone: (312) 744-7150



CITY OF CHICAGO
DEPARTMENT OF LAW
TORTS DIVISION



April 16, 2012

VIA EMAIL: Anselm45@gmail.com; and
VIA UNITED STATES MAIL

Mr. Robert More
P.O. Box 6926
Chicago, IL 60680

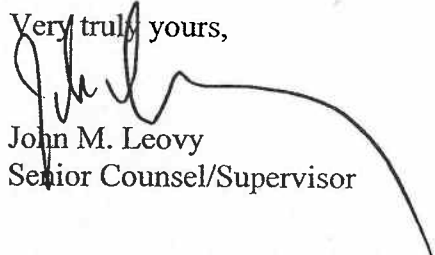
Re: *More v. Chicago, et al.*
11 M1 12530

Dear Mr. More,

Attached hereto please find a copy of the order entered in this case today.

Demand is hereby made to you for full payment of the sum of \$300.00 United States Dollars on or before April 23, 2012. You may make your check payable to the City of Chicago and tender it c/o John M. Leovy, City of Chicago Department of Law, Torts Division, 30 N. LaSalle, Suite 800, Chicago, IL 60602. If I do not receive the check by April 23, 2012, the City may institute enforcement proceedings.

Very truly yours,


John M. Leovy
Senior Counsel/Supervisor

Re: More v. Chicago, 11 M1 12530 - 11 M1 012530 - bcc'es -attached is the type of demand from a political subdivision of the Committee of 300 owned and operated Talmudic-barbaric Enslavement & Extermination Apparatus with which we have all become so

Robert More [anselm45@gmail.com]

Sent: Wednesday, April 18, 2012 6:34 AM

To: Leovy, John



11 M1 012530 - bcc'es -attached is the type of demand from a political subdivision of the Committee of 300 owned and operated Talmudic-barbaric Enslavement & Extermination Apparatus with which we have all become so painfully familiar.

1. It is the informed understanding of Robert J. More that RJM lacks the authority to remit as much as one cent to the City of Chicago ("Chicago") in regard to the matters this email concerns and RJM herein dishonors the presentment contained in the letter attached to this email.
 2. On the contrary, it is RJM's informed understanding that Chicago now owes RJM not only the damages on the original torts, but malicious defense of a case, abuse of process, S.C. R. 137 and equitable remedy, sanctions, in regard to Chicago's defense of this case.
 3. Lest RJM jeopardize any intentional &/or reckless infliction of emotional distress claims which RJM presently possesses against you and Chicago by neglecting to complain in such regard, RJM herein objects to the use of the words "Dear" or "Please" in any correspondence ever transmitted from the City of Chicago to RJM other than correspondence from someone, who would howsoever, ever be employed by it, who would never participate in the shedding of innocent blood without just cause and would not be willing to lick Tel Aviv toilet rims, who might have reason to transmit some communication to RJM.
 4. RJM demands the name of the Chicago Attorney who accompanied Hill to the audience ("sham audience") conducted on 4/16/12 in this case and an explanation regarding why he refused to provide such to RJM upon his having received a demand wherefore on 4/16/12.
 5. RJM also demands the contact information, home addresses, and list of assets to which legal claim is made, of everyone who has been involved in the "defense" of the case this email concerns.
 6. RJM herein renews his demand for access to all files sought via FOIA's filed with Chicago, by RJM in the past 3 months, and 5 years, which have not been produced and a list of all cases in which you have participated as a representative of Chicago since your employment therewith commenced.
 7. RJM fears that RJM would die of loneliness at the thought that some warmblooded specimen would be subject to the extortion, brutality, and cannibalism for which Chicago has so ignominiously distinguished itself over the years, without whatever utility might be provided in a given instance from whatever assistance RJM might be capable of providing in a given instance for the purpose of the protection of any and everything deserving of protection from the ravages of Lucifer and his minions.
 8. This email has taken RJM 33 minutes to compose, the cost of which has been necessitated in RJM's understanding by the predatory and cannibalistic activity conducted by you and your co-criminals in the Chicago Law Department. To keep damages to an unavoidable minimum, this email is truncated here but will be augmented, and/or superseded as circumstances would indicate, it would be necessary to so modify it.
- RJM

On Mon, Apr 16, 2012 at 4:42 PM, Leovy, John <John.Leovy@cityofchicago.org> wrote:

Mr. More,

Attached please find a letter and the order entered in today's case.

--

Robert J. More - non-unempathetic, non-unconcerned, non-ungrateful,
petitioner for a reprieve from the ordeal of continued earthly
existence resolved to do whatever has to be done to procure such type
reprieve, if such can be procured, as soon as it can be procured
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