

Case #: 2020-SC-000630

Rcpt #: 40728366

Payor: PLAINTIFF

DEFENDANT

LINK KEVIN

GRANITE CITY

35 DUBLIN DR

2000 EDISON AVE

GRANITE CITY

IL 62040-0000

GRANITE CITY

IL 62040-0

Itm	Curr Charge	Description	Qty	Who
001	264.00	TORT - MONEY DAMAGES (\$2,500.0		1001 LINK KEVIN
002	.00	SMALL CLAIMS SUMMONS ISSUED GI		1001 LINK KEVIN
Tot	264.00			

Payment Descriptions	Curr Payment	Tot. Paid	Tot. Due	
AUTOMATION 19	20.00	20.00	.00	
DOCUMENT STORAGE 19	20.00	20.00	.00	
CIRCUIT CRT CLERK OP ADMI	5.00	5.00	.00	
ARBITRATION 19	8.00	8.00	.00	
ACCESS TO JUSTICE 19	2.00	2.00	.00	
SUPREME COURT SPEC PURPOS	9.00	9.00	.00	
CIRCUIT CLERK FILING COST	194.00	194.00	.00	
LAW LIBRARY FEE 19	6.00	6.00	.00	
Tot	264.00	264.00	.00	Curr Charge 264.00
				Curr Payment 264.00
				Bond Used .00
Cash Amt 264.00	Check Amt .00			Tot. Tender 264.00
				Change Due .00

By: _____

Deputy Clerk: TW C020

Batch 03091-001 Date 3/09/2020 Time 9/21/04

John William Apperson

2812 Idaho

Granite City, Illinois 62040

(618) 451-7895 Hm (618) 781-2518 Cell

SAM@AppsMagic.com

March 9, 2020

Kevin Link
35 Dublin Drive
Granite City, Illinois 62040

RE: ~~2019~~ SC 000630

2020
KL

Kevin Link

Vs.

Werths, Richard and Unknown Code Officials

Richard Werths and Unknown Code Officials were served with summons on Monday, March 9, 2020 at approximately 1:p.m. by handing the summons to Richard Werths personally at the Granite City, City Hall, 2000 Edison Avenue, Granite City, Illinois62040

Respectfully

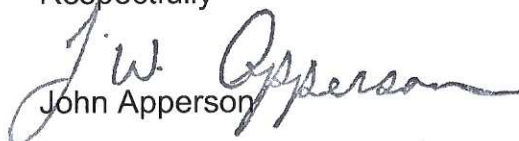

John Wm. Apperson

STATEMENT FOR SERVICE

Service of Summons to Richard Werths & Unknown /Code Officials \$40.00

Total \$40.00

Respectfully


John Apperson

SMALL CLAIMS COMPLAINT

Complaint _____

No. _____

KEVIN LINK
35 Dublin Dr.
Granite city, IL 62040

GRANITE CITY [GC], RICHARD WERTHS &
UNKNOWN CODE ENFORCMENT OFFICIALS
2000 Edison Ave., Granite City, IL 62040

Plaintiff(s)

Defendant(s)

SMALL CLAIM COMPLAINT

I, the undersigned, claim that the defendant is indebted to the plaintiff in the sum of \$ \$10,000.00 or Just Compensation for Damages to Plaintiff resulting from targeted, malicious litigation of citations 148 & 149 from 1-7-19 to 4-18-19. Plaintiff Link alleges that both citations were issued and litigated by GC code enforcement officials for the purposes of harassment, with the intent to force Link to liquidate all of his Granite city rental properties. and that the plaintiff has demanded payment of said sum; that the defendant refused to pay the same and no part thereof has been paid, that the defendant resides at 2000 Edison Ave., Granite City, IL 62040

phone no. (618) 452-6200; that the plaintiff resides at 35 Dublin Dr. Granite City, IL 62040

phone no. 618-931-0244; in the State of Illinois.

Dated: _____, 2020

(Signature of Plaintiff)

KEVIN LINK

AFFIDAVIT

on oath states that the allegations in this complaint are true.


Signed and Sworn to before Me



3/9/2020

(Seal)

(Notary Public)


Deputy Clerk

Copy to:

Court Copy

Defendant's Copy

Plaintiff's Copy

GRANITE CITY, ILLINOIS
NOTICE OF ORDINANCE VIOLATION

(STATE OF ILLINOIS)
 (COUNTY OF MADISON)

No. 0500085848
 Complainant CITY OF GRANITE CITY

COMPLAINT

The Complainant named above by its designated Officer, on oath states that on:

MONTH	DATE	YEAR	HOUR
11	13	2018	1:20 PM

Respondent:

LINK, KEVING
 Name

35 DUBLIN DR
 Address

GRANITE CITY IL 62040
 City State Zip

M WHITE
 Sex Race

9/26/1963 L520-5076-3274
 Date of Birth Driver's License Number

Committed the violation of JUNK TRASH DEBRIS ON PROPERTY

in violation of Section 8.34.020 of the Granite City Municipal Code

at 2707 E 24TH ST, GRANITE CITY in Granite City

Vehicle Make/Model Year License Plate Number Plate Expiration State

and further states that he has reasonable grounds to believe the defendant is in violation of said ordinance on the above-stated date.

Officer BEDARD, TIMOTHY Date 11/13/2018

- Police Sanitation Inspection Fire

TO THE RESPONDENT HEREIN NAMED:

You are hereby notified that the City of Granite City has issued you this NOTICE OF ORDINANCE VIOLATION.

TO PLEAD GUILTY TO: **SEE REVERSE SIDE FOR INSTRUCTIONS**

- PAY \$20 WITHIN 10 DAYS.
 PAY \$50 AFTER 10 DAYS AND BEFORE THE COURT DATE.

- PAY \$100 WITHIN 10 DAYS.
 PAY \$150 AFTER 10 DAYS AND BEFORE THE COURT DATE.

- PROOF OF REPAIR OR COMPLIANCE REQUIRED (see reverse side of this notice).
 YOU MUST APPEAR AT THE HEARING INDICATED BELOW.

IF THE FINE IS NOT PAID, YOU WANT TO PLEAD NOT GUILTY OR IF PROOF OF COMPLIANCE IS REQUIRED, YOU MUST APPEAR AT THE HEARING INDICATED BELOW.

Hearing Appearance:

Monday 1/7/2019 at 4:00 PM
 in ROOM 6B, 2000 EDISON, GRANITE CITY IL

CERTIFICATE OF SERVICE

I, the undersigned, an authorized representative of the City of Granite City, complainant herein, verify that on the stated date and time, a copy of the foregoing Complaint was served upon the named respondent. Further, under penalties as provided by law pursuant to Section 1-109 of the Code of Civ. Proceedings, the undersigned certifies that the statements set forth in the Complaint are true and correct.

Personal service / / 1st Class Mail / /

Certified Mail / / Other / /

FINES MAY BE PAID AT CITY TREASURER'S OFFICE, CITY HALL, 2000 EDISON, GRANITE CITY, ILLINOIS. MAKE CHECKS PAYABLE TO "CITY OF GRANITE CITY". IF NOT PAID BY THE DUE DATE, YOU ARE TO APPEAR ON THE APPOINTED COURT DATE IN ROOM 6B, CITY HALL, GRANITE CITY. AT THAT POINT PROSECUTION UNDER THE CITY CODE WILL COMMENCE AND YOU MAY BE REQUIRED TO PAY INCREASED FINES AND COSTS. FAILURE TO APPEAR MAY RESULT IN THE ISSUANCE OF A WARRANT FOR YOUR ARREST.

IF PROOF OF REPAIR OR COMPLIANCE IS REQUIRED:

You have been issued this notice for violation of an ordinance violation. This is not a ticket which requires the posting of a bond nor will a report be made to the Secretary of State.

If the above box is checked, you are required to present proof of repair or compliance to the appropriate city department official or at the court date noted above. Your failure to do this may result in fines and other appropriate sanctions.

Examined by: _____

Name Title No.

Department Date

COMMENTS BY CITY OFFICIAL

PLEASE REMOVE OLD COLLAPSED ABOVE GROUND POOL FROM THE
YARD OF RENTAL PROPERTY, PLEASE REPAIR FASCIA AND INSTALL
GUTTERS ON DETACHED GARAGE.

First and second Copies - Treasurer Third Copy - Department Fourth Copy & Envelope - Violator

GRANITE CITY, ILLINOIS
NOTICE OF ORDINANCE VIOLATION

(STATE OF ILLINOIS)
 (COUNTY OF MADISON)

No. 0500085849
 Complainant CITY OF GRANITE CITY

COMPLAINT

The Complainant named above by its designated Officer, on oath states that on:

MONTH	DATE	YEAR	HOUR
11	13	2018	1:20 PM

Respondent:

LINK, KEVING

Name

35 DUBLIN DR

Address

GRANITE CITY

City

IL

State

62040

Zip

M

Sex

WHITE

Race

9/26/1963

Date of Birth

L520-5076-3274

Driver's License Number

Committed the violation of PROPERTY MAINTENANCE CODE

In violation of Section 15.04.010 of the Granite City Municipal Code

at 2707 E 24TH ST, GRANITE CITY in Granite City

Vehicle Make/Model Year License Plate Number Plate Expiration State

and further states that he has reasonable grounds to believe the defendant is in violation of said ordinance on the above-stated date.

Officer BEDARD, TIMOTHY Date 11/13/2018

Police Sanitation Inspection Fire

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in ROOM 6B, 2000 EDISON, GRANITE CITY IL

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Personal service / / 1st Class Mail / /

Certified Mail / / Other / /

FINES MAY BE PAID AT CITY TREASURER'S OFFICE, CITY HALL, 2000 EDISON, GRANITE CITY, ILLINOIS. MAKE CHECKS PAYABLE TO "CITY OF GRANITE CITY". IF NOT PAID BY THE DUE DATE, YOU ARE TO APPEAR ON THE APPOINTED COURT DATE IN ROOM 6B, CITY HALL, GRANITE CITY. AT THAT POINT PROSECUTION UNDER THE CITY CODE WILL COMMENCE AND YOU MAY BE REQUIRED TO PAY INCREASED FINES AND COSTS. FAILURE TO APPEAR MAY RESULT IN THE ISSUANCE OF A WARRANT FOR YOUR ARREST.

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Examined by: _____
 Name Title No.

Department Date

COMMENTS BY CITY OFFICIAL

PLEASE REMOVE OLD COLLAPSED ABOVE GROUND POOL FROM THE
YARD OF RENTAL PROPERTY, PLEASE REPAIR FASCIA AND INSTALL
GUTTERS ON DETACHED GARAGE.

First and second Copies - Treasurer Third Copy - Department Fourth Copy & Envelope - Violator

**To Madison and Granite city
Defendant's Resignation and Plea**

Regarding Defendant's Madison and Granite City Business License:

I, Kevin Link, no longer have the ability to conduct business within the cities of Madison and Granite. It simply is unfeasible to operate my business when your municipal officials continue to unjustly interfere by issuing tickets without merit or warning, demanding frivolous time consuming court appearances, and selectively prosecuting knowingly flawed tickets. Therefore, regrettably, I have no viable alternative but to officially resign as a Madison and Granite city business owner, effective immediately, and therefore I will have no further need for a Madison city or Granite city business license.

See Illinois Fifth District Appellate brief 5-18-0453 and Madison County Illinois Defendant case filings for Ticket #2016ov400378.

Regarding future court appearances:

Consider this (citation 0500085848 and 0500085849) to be my *last* private (off the public record) court appearance. Please officially issue and send all future court summons through the Madison County Circuit Court.

Regarding citation 0500085848 and 0500085849:

My plea is NOT GUILTY and I request a trial-by-jury.

Please be advised that I am currently seeking legal council, however, do not yet have council at this time. Therefore, I request that all future correspondence from your municipality be delivered in writing via certified mail to the address below.

Respectfully,



3/3

Defendant Kevin Link
P.O. Box 22
Granite City, IL 62040

HAND delivered
1-7-19 GC court
R Werth



Witness

cc: Illinois State Attorney general



City of Granite City
Granite City, Illinois 62040

February 12, 2019

Kevin G Link
35 Dublin Drive
Granite City, IL 62040

Citation number: 500085848
Offense: Junk, Trash & Debris
Citation number: 500085849
Offense: Property Maintenance Code

LOP: 2707 E 24th St

Dear Respondent:

Attached please find a copy of the **FINDING, DECISION AND ORDER DEFAULT** entered at the Municipal Hearing held on February 11, 2019.

Judgment total: **\$1500.00**

If you believe this Default Order was entered in error, you must contact the Treasurer's Office immediately (618) 452-6207. Otherwise, the Judgment total is due as specified in the Finding, Decision and Order Default. *The Judgment due must be paid to the City Treasurer, 2000 Edison Avenue, Room 2 Granite City, Illinois 62040.*

Sincerely,

A handwritten signature in cursive script that reads "Shari Grim".

Shari Grim
Deputy City Treasurer
Municipal Court Coordinator

All major credit/debit cards accepted in the Treasurer's office
Payments may also be made at www.illinoisepay.com



Motion to Vacate Default Judgment and Dismiss

I, Kevin Link, defendant for citations #0500085848 and #0500085849, request the default judgments be reversed and the cases dismissed on the following grounds:

1. I appeared in court on January 7th, 2019:
 - This was witnessed by at least three people present with me.
2. My tenants and I stepped up together to speak to the hearing officer:
 - The hearing officer examined photographs taken by city inspectors earlier that morning, showing that the required work had been completed.
 - Tenants stated that the issues were resolved and plead not guilty .
 - Hearing officer verbally dismissed the citation against my tenants, who were dismissed.
3. I then spoke to the hearing officer and submitted a written statement:
 - Hearing officer reviewed my written statement.
 - The court took no further action and *did not* set a new court date.
4. I received a notice from Granite city, dated January 8th, 2019, which was erroneous as:
 - It stated that I would be required to appear on January 7th, 2019, however, I already had appeared on January 7th before the receipt of this notice.
 - Misdated, as it gave a court date which had already transpired.
5. No other notice was received by myself or the tenant, until the default judgment notice I received on February 12th, 2019.
6. Overall, no basis for a default judgment order exists.

As the deadline to file an appeal for this case is near, I request your written decision be delivered to me at or before my 9:00 AM court appearance with your city on 3-14-2019 .

Kevin Link


3-11-19 

Hand delivered
To KW 3-11-19
Gc. Court house
(Shari not in)

Filed 3-15-19
19 MR 000357

IN THE CIRCUIT COURT
THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS

Kevin Link
(Your Name)

Plaintiff,

vs

CASE NO. _____

City of Granite City

2000 Edison Ave.

Granite City, IL 62040

Defendant

COMPLAINT FOR ADMINISTRATIVE REVIEW

The above-named Plaintiff, complaining of the Defendant, states as follows:

1. That a Findings, Decision and Order was entered by the hearing officer in the Code Hearing Unit of the Defendant.
2. A copy of that Findings, Decision and Order is attached to this Complaint and made part of this Complaint.
3. This action is filed within thirty-five (35) days of the receipt of the attached Findings, Decision and Order by the Plaintiff.
4. Plaintiff seeks administrative review of said Findings, Decision and Order.

1



City of Granite City
Granite City, Illinois 62040

April 18, 2019

Kevin G Link
35 Dublin Drive
Granite City, Il 62040

Dear Respondent:

Reference: Adjudication of Municipal Code Violation
LOP: 2707 E 24th St

Citation number: 500085848
Offense: JUNK, TRASH & DEBRIS

Citation number: 500085849
Offense: PROPERTY MAINTENANCE CODE

Please be advised Scott Griffith, Administrative Hearing Officer, has dismissed and closed the above named citation.

For questions concerning this notice, you may telephone the office of the City Treasurer (618) 452-6207.

Sincerely,

A handwritten signature in cursive script that reads "Shari Grim".

Shari Grim
Deputy Treasurer
Municipal Court Coordinator

2. Both citations request that the plaintiff remove the above ground pool from his rental property, and repair fascia/install gutters on the detached garage. The plaintiff asserts that he had addressed both of these complaints before the January 7th hearing, and the record shows that no additions or changes were made to the evidence the trial court was presented subsequent to the January 7th hearing. Why is it then that citation #500085848 was voided on January 8th, but citation #500085849 was reset for a new hearing on February 11th, 2019? Why did the defendant not dismiss citation #500085849 along with #500085848 on January 8th? What prompted the defendant to instead wait until the filing of an administrative review to finally dismiss the citation, when the evidence had not changed?
3. Self-admittedly by the defendant, their Treasurer's office erred by sending a hearing notice that incorrectly showed January 7th, 2019, instead of February 11th, 2019. The defendant also concedes that the plaintiff was not otherwise notified of his February 11th court date.
4. On February 11th, the plaintiff did not appear at his scheduled hearing due to the defendant's failure to notify the plaintiff of said court hearing. The City of Granite (defendant) then committed another critical error by issuing a meritless default judgment to plaintiff Link for citation #500085849, as the city presumably failed to consult the record for verification that the plaintiff had been notified of the February 11th hearing. This significantly extended litigation.
5. Not only did the City of Granite (defendant) issue a meritless default judgment to plaintiff Link, but the defendant self-admittedly (*Defendant's Motion*, Pg. 3) failed even in properly notifying plaintiff Link of the judgment entered against him, further complicating and needlessly extending litigation. The notice mailed to plaintiff Link by the defendant showed that a default judgment was entered for **both** citations #500085848 and #500085489 in a total amount of \$1,500 (*Defendant's Motion*, Exhibit 2); while the defendant asserts that a default judgment had only been entered for citation #500085489 in the amount of \$750. The defendant alleges that the notice was "incorrect" and that it is unknown why Mr. Link received this "inaccurate" notice.

6. In the case of the April 8th court hearing, the defendant failed once *again* to notify the plaintiff of his hearing; no notice of the April 8th hearing was mailed to the plaintiff, nor does any evidence of such a mailed notice exist in the record. Instead, the only reason the plaintiff became aware of his April 8th hearing is that he took time out of a business day to inquire in-person at the Granite city court house, an action deemed necessary due to the defendant's persistent failure to properly notify the plaintiff of proceedings, whether by issuing notices with severe inaccuracies (See default judgment notice; *Defendant's Motion, Exhibit 2*), or by failing to issue any notice whatsoever, such was the case for the February 11th hearing and the April 8th hearing.

Every single error impacted the livelihood of this plaintiff to some degree, whether by causing needless stress, or by frivolously and inappropriately wasting the plaintiff's time, effort, and funds all of which would have been better spent maintaining his already struggling business; it is expected that some errors will arise as a result of litigation, yet the amount and severity of errors made here would be difficult to justify as simple incompetence. First, the defendant's failure to notify the plaintiff of his February 11th hearing resulted in the issuance of a meritless default judgment, which made it necessary for this pro-se plaintiff to expend more time and effort to prepare his legal response. The plaintiff was further distressed upon receiving a notice of that meritless default judgment that listed an amount *double* (\$1,500) that of what the defendant has asserted to be the actual judgment amount (\$750). Then after the plaintiff's motion to vacate that erroneous judgment was granted, the city fails to mail notice of the reset hearing date on April 8th, an action which certainly would of resulted in further significant damages to this plaintiff had he not taken the initiative to inquire in person at the court house. Lastly, why did the defendant wait until after the filing of this administrative review to void citation #500085489? The plaintiff had addressed the issues listed on both citations prior to attending the January 7th hearing, and therefore nothing in actuality had changed as to the state of the plaintiff's property between the January 7th hearing and the final dismissal date on April 8th, and to this plaintiff's knowledge there were no additions or changes to the evidence the trial court had at its disposal to prompt that overdue dismissal. This suggests that all litigation after the January 7th hearing was pointless and a significant waste of the plaintiff's time and tax payer dollars, and the fact that the defendant delayed voiding the citations until an administrative review was filed is telling in itself.

For a municipality to make this many egregious "errors" when litigating a single set of linked citations would mean that the defendant is guilty of at least one of two possibilities. Either the City of Granite (defendant) is guilty of gross negligence, incompetence, and mismanagement to an extent which alone would be worthy of admonishment and intervention by this Court; or these were not errors at all, but instead a calculated and targeted attempt to manipulate the court system in a malicious pursuit of this Plaintiff.

Finally, not all relief sought by this administrative review has been achieved, the plaintiff is seeking any just compensation that this court deems appropriate for the additional time, effort, and funds that this plaintiff was needlessly required to expend as a direct result of the numerous, severe errors made by the defendant during proceedings in the trial court. If it is not this court's duty to adjudicate or grant just compensation, then the plaintiff asks that this court take what action it deems appropriate to ensure a more fair, just, and appropriate litigation process that will prevent such a grievous string of errors from occurring in the future, whether through due admonishment or other action against this defendant; as it should be clear to this Court that the amount and severity of the errors made during litigation here by the City of Granite are far in excess of what would be considered acceptable or justifiable for a municipality. Major clerical errors such as listing the wrong date on hearing notices (if a notice is even sent at all), and even more severely incorrectly notifying a citizen of a non-existent default judgment, as in the case of citation #500085848 here, have the potential to cause major hardship for less fortunate individuals who simply cannot afford to "be given the run-around" by their city, taking time off work to go to court for potentially non-existent court hearings, or to defend themselves when the city fails to notify them of a hearing date and issues a meritless default judgment.

Respectfully Submitted,

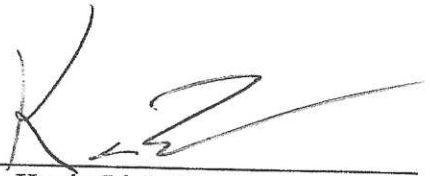


Plaintiff Kevin Link, Pro-Se

Certificate of Service

I hereby certify that on Jun 11, 2019, I electronically filed this **Reply to Motion to Dismiss** with the Clerk of the Court using the Odyssey E-filing system and that a paper copy has been mailed to **Erin Phillips**, attorney for the defendant at the following address:

Erin M. Phillips,
Unsell, Schattnik & Phillips
3 S. 6th Street,
Wood River, IL 62095



Kevin Link, Pro se

March 9, 2020

STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE THIRD JUDICIAL CIRCUIT
MADISON COUNTY
(618) 296-4464
madisoncountycircuitclerkIL.org

SUMMONS

DATE: March 09, 2020

KEVIN LINK

PLAINTIFF

VS.

CASE NO. 2020 SC 000630

GRANITE CITY
2000 EDISON AVE
GRANITE CITY, IL 62040

DEFENDANT

TO EACH DEFENDANT:

YOU ARE SUMMONED and required to appear before this Court at MADISON COUNTY COURTHOUSE, 155 N. MAIN, EDWARDSVILLE, IL 62025, Room TBA at 02:00PM on or before April 15, 2020, to answer the complaint in this case, a copy of which is hereto attached. IF YOU FAIL TO DO SO, A JUDGMENT BY DEFAULT MAY BE TAKEN AGAINST YOU FOR THE RELIEF ASKED IN THE COMPLAINT.

TO THE OFFICER:

This summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service and not less than three days before the day for appearance. If service cannot be made, this summons shall be returned so endorsed. This summons may not be served later than three days before the day for appearance.

Witness: MARK VON NIDA the Clerk of said Circuit Court and the seal thereof, at Edwardsville, IL on March



MARK VON NIDA
CLERK OF THE CIRCUIT COURT

BY: 
Deputy Clerk

ATTORNEY FOR PETITIONER:
KEVIN LINK, Pro Se
35 DUBLIN DR
GRANITE CITY, IL 62040

Date of Service: March 9, 2020, 20 .

(To be inserted by officer on the copy left with the defendant or other person.)

1 of 2

E-filing is now mandatory for documents in civil cases with limited exemptions. To e-file, you must first create an account with an e-filing service provider. Visit <https://efile.illinoiscourts.gov/service-providers.htm> to learn more and to select a service provider. If you need additional help or have trouble e-filing, visit <http://www.illinoiscourts.gov/FAQ/gethelpasp>

CASE No. 2020 SC 000630

IN THE CIRCUIT COURT
THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS

KEVIN LINK)
)
 Plaintiff,)
) 2020-SC-00630
 v.)
)
 GRANITE CITY, RICHARD WERTHS,)
 AND UNKNOWN CODE ENFORCEMENT)
 OFFICIALS)
)
 Defendant.)

ENTRY OF APPEARANCE

Comes now attorney Erin Phillips of the law firm Unsell, Schattnik & Phillips, P.C., and enters her appearance as attorney of record on behalf of the Defendants, RICHARD WERTHS AND UNKNOWN CODE ENFORCEMENT OFFICIALS, and requests that all future pleadings and correspondence in this file be forwarded to her office.

/s/ Erin M. Phillips
BY: _____
Erin M. Phillips #6289723
Bradley C. Young #6324886
Unsell, Schattnik & Phillips
3 South 6th Street
Wood River, IL 62095
(618) 258-1800
Erin.phillips7@gmail.com

Certificate of Service

I hereby certify that on March 12, 2020 I electronically filed this **Entry of Appearance** with the Clerk of the Court using the Odyssey E-filing system and a paper copy has been mailed to Pro Se Plaintiff Kevin Link at the following address:

Kevin Link
PO Box 22
Granite City, Illinois 62040

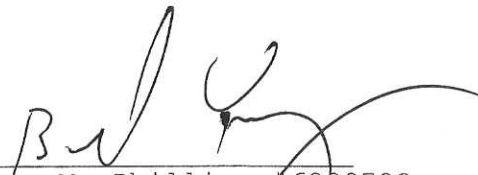
/s/ Erin Phillips
Erin M. Phillips

IN THE CIRCUIT COURT
THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS

KEVIN LINK)
)
 Plaintiff,)
) 2020-SC-00630
 v.)
)
 GRANITE CITY, RICHARD WERTHS,)
 AND UNKNOWN CODE ENFORCEMENT)
 OFFICIALS)
)
 Defendant.)

ENTRY OF APPEARANCE


Comes now attorney Bradley Young of the law firm Unsell, Schattnik & Phillips, P.C., and enters his appearance as attorney of record on behalf of the Defendants, RICHARD WERTHS AND UNKNOWN CODE ENFORCEMENT OFFICIALS, and requests that all future pleadings and correspondence in this file be forwarded to his office.

BY: 
Erin M. Phillips #6289723
Bradley C. Young #6324886
Unsell, Schattnik & Phillips
3 South 6th Street
Wood River, IL 62095
(618) 258-1800
Bradleyyoung925@gmail.com

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Kevin Link
PO Box 22
Granite City, Illinois 62040



Bradley C. Young