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6/24/2025 8:05 AM
Mariyana T. Spyropoulos
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**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
CHANCERY DIVISION**

KYLE HADLEY,)
)
Plaintiff,)
)
v.)
BRANDON MCGIVERN,)
)
Defendant.)

Case No. **2025CH05527**

DEFENDANT'S INTERROGATORIES TO PLAINTIFF

TO: Plaintiff Kyle Hadley, by and through his attorney, Mason Cole

Pursuant to Illinois Supreme Court Rules 213 and 201 et seq., Defendant Brandon McGivern propounds the following Interrogatories to be answered under oath within thirty (30) days of service:

INSTRUCTIONS

1. These Interrogatories are continuing in nature and require supplementation if additional information becomes available.
 2. If you cannot answer an Interrogatory completely, answer to the extent possible and explain why you cannot provide a complete answer.
 3. Each answer must be signed under oath by the person making it.
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INTERROGATORIES

INTERROGATORY NO. 1: State the full name, address, and relationship to you of every person who has paid you money for occupancy, use, or rental of any property under your control from June 1, 2022 to present, including tenants of your condominium and any portion of the Property.

INTERROGATORY NO. 2: For each person identified in your answer to Interrogatory No. 1, state:

- a) The total amount of money received from that person
- b) The dates and amounts of each payment
- c) The method of payment (cash, check, electronic transfer, etc.)
- d) The rental rate charged per month
- e) The time period of their occupancy

INTERROGATORY NO. 3: Describe in detail all rental arrangements, agreements, or understandings (whether written or oral) you have had concerning any property under your control from June 1, 2022 to present, including your condominium rental arrangements and any arrangements concerning the Property, including the terms, duration, and rental amounts.

INTERROGATORY NO. 4: State the date you first discovered water damage at the Property and describe in detail:

- a) How you discovered the damage
- b) The extent of the damage as you understood it
- c) All actions you took regarding the damage
- d) All persons you notified about the damage and when

INTERROGATORY NO. 5: Identify all contractors, repair persons, or service providers who accessed the Property from January 1, 2025 to present, including:

- a) Their names and contact information
- b) The dates of their access and purpose
- c) All communications you had with them (dates, methods, substance)
- d) Whether Defendant was notified before, during, or after their access
- e) Any estimates, reports, or assessments received
- f) Any work performed or damage caused

INTERROGATORY NO. 6: State the exact date your condominium sale closed in October 2023 and describe how you used the proceeds from that sale, including:

- a) The total amount of proceeds received
- b) The exact amount applied to vehicle purchase and vehicle details
- c) Any other specific uses of the proceeds
- d) The amount remaining after all expenditures

INTERROGATORY NO. 7: Describe in detail the creation, modification, and access history of any equity tracking documents related to the Property, including:

- a) When you first created any equity tracking document
- b) All persons who had access to such documents and when
- c) All modifications made to such documents and the dates
- d) How you obtained access to any version of Defendant's equity tracking after January 30, 2025
- e) All software, applications, or methods used to create or modify such documents

INTERROGATORY NO. 8: Identify all bank accounts in your name or control from June 1, 2022 to present where rental payments were deposited from any source, including:

- a) Bank name and account numbers
- b) Account type (checking, savings, etc.)
- c) Approximate balance range during the relevant period
- d) Sources of rental income deposited (condominium tenants, Property subtenants, etc.)

INTERROGATORY NO. 9: State your understanding of Illinois real estate law regarding:

- a) Requirements for written purchase agreements
- b) Professional duties of licensed real estate agents
- c) Disclosure obligations regarding property damage

INTERROGATORY NO. 10: Describe all improvements, modifications, or alterations you made to the Property, including:

- a) Description of each improvement
- b) Cost of each improvement
- c) Whether you obtained Defendant's permission
- d) Disposition of any appliances or fixtures removed

INTERROGATORY NO. 11: State all facts supporting your claim to any equity interest in the Property, including your calculation methodology and any supporting documentation.

INTERROGATORY NO. 12: State whether you operated rental businesses involving multiple properties simultaneously from June 2022 to present, including:

- a) Rental of your condominium while residing at the Property
 - b) Subletting portions of the Property while claiming purchase rights
 - c) Total rental income received from all sources by month
 - d) Whether you obtained any business licenses for these operations
 - e) Your understanding of any legal, ethical, or professional obligations regarding such arrangements given your real estate license
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Interrogatories was served upon Plaintiff's counsel by email to mcole@colesadkin.com on June 24, 2025.

RESPECTFULLY SUBMITTED,

/s/ Brandon McGivern

Brandon McGivern, Defendant

Brandon McGivern, Pro Se
5701 N Sheridan Rd #23G
Chicago, IL 60660

Phone: [REDACTED]
Email: [REDACTED]