

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
CHANCERY DIVISION**

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

Case No. **2025CH05527**

DEFENDANT'S REQUESTS FOR PRODUCTION OF DOCUMENTS

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

Pursuant to Illinois Supreme Court Rules 214 and 201 et seq., Defendant Brandon McGivern requests that Plaintiff produce the following documents for inspection and copying within thirty (30) days of service of this request:

DEFINITIONS

"Document" includes all writings, recordings, photographs, electronic files, text messages, emails, and any other data compilations from which information can be obtained.

"Property" means the real estate located at 6122 N. Winthrop Avenue, Unit C, Chicago, Illinois 60660.

"You" or "Your" refers to Plaintiff Kyle Hadley and his agents, representatives, employees, and attorneys.

FILED DATE: 6/24/2025 8:05 AM 2025CH05527

DOCUMENT REQUESTS

REQUEST NO. 1: All bank statements, checking account statements, and deposit records in your name or control from June 1, 2022 to present, including but not limited to accounts at any financial institution where rental payments were deposited from any source.

REQUEST NO. 2: All documents evidencing payments received from any person for occupancy, use, or rental of any property under your control from June 1, 2022 to present, including but not limited to:

- Payments received for your condominium rental (2022-2023)
- Payments received for any portion of the Property (2022-present)
- Checks, electronic transfers, cash receipts
- Venmo, Zelle, PayPal, or other electronic payment records
- Money orders or cashier's checks

REQUEST NO. 3: All communications (including text messages, emails, letters, and instant messages) with Timothy Lenihan and any other person(s) regarding occupancy, rental, or payment for use of any property under your control from June 1, 2022 to present, including communications regarding your condominium rental arrangements.

REQUEST NO. 4: All rental agreements, lease agreements, subletting agreements, or arrangements (whether written or oral) concerning any property under your control from June 1, 2022 to present, including arrangements for your condominium and any portion of the Property, including documentation of rental amounts charged.

REQUEST NO. 5: All documents relating to the water damage at the Property discovered in January 2025, including but not limited to:

- Photographs or videos of the damage
- Communications with contractors or repair persons
- Repair estimates or invoices
- Text messages, emails, or other communications with Defendant regarding the damage

REQUEST NO. 6: All communications with any contractor, repair person, or service provider who accessed the Property or discussed the Property from January 1, 2025 to present, including communications regarding water damage assessment, repair estimates, and any work performed.

REQUEST NO. 7: All documents evidencing your purchase of a vehicle in or around October 2023, including purchase agreements, financing documents, and payment records.

REQUEST NO. 8: All documents relating to the sale of your condominium in October 2023, including closing statements and proceeds documentation.

REQUEST NO. 9: All communications (including emails, text messages, and letters) between you and Defendant from October 1, 2024 to present.

REQUEST NO. 10: All documents evidencing any equity calculations or tracking related to the Property, including any versions of equity tracking spreadsheets or documents other than those already produced in this litigation.

REQUEST NO. 11: All documents relating to your real estate license, including but not limited to:

- Continuing education records and professional standards materials received from 2023 to present
- Any disciplinary communications, complaints, or investigations

- Professional standards training materials regarding oral contracts and fiduciary duties
- Any research or materials you reviewed regarding Illinois real estate law from 2022 to present

REQUEST NO. 12: All documents evidencing improvements, modifications, or alterations made to the Property during your occupancy, including receipts, invoices, and disposal records for any appliances or fixtures.

REQUEST NO. 13: All communications with your attorney Mason Cole regarding this litigation, the Property, or the underlying dispute (except those protected by attorney-client privilege).

REQUEST NO. 14: All documents supporting your claimed equity interest in the Property, including but not limited to:

- Any calculations, appraisals, or financial projections
- Legal research or attorney advice regarding equity claims
- Any valuations or market analyses of the Property

REQUEST NO. 15: All documents relating to your rental business operations from June 2022 to present, including but not limited to:

- Business licenses, permits, or registrations for rental operations
- Tax returns or schedules showing rental income
- Marketing materials, advertisements, or listings for rental properties
- Business bank accounts or financial records related to rental income
- Any documents relating to compliance with Chicago landlord-tenant ordinances

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Requests for Production of Documents 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]