

## **EXHIBIT 4**

Timeline of Friday's Response Pattern:  
12:26 pm CDT- Friday email communication  
5:19 pm CDT - voicemail to Mr. Cole  
5:21 pm CDT - Mr. Hadley's response

**Re: Court-Ordered Property Access - June 7, 2025 - Case No. 2025-M1-707919**

3 messages

Mason Cole &lt;mcole@colesadkin.com&gt;

Fri, Jun 6, 2025 at 6:19 PM

To: Brandon McGivern [REDACTED]

Cc: Kyle Hadley [REDACTED]@gmail.com&gt;, [REDACTED]

Kyle, can you reply all to Brandon and [REDACTED] for the limited purpose of confirming you will be on premises tomorrow (Saturday) from 8am-5pm to provide access to selected contractor?

Brandon, if you can confirm updated access times so that we don't have anyone waiting around, that would be appreciated.

On Fri, Jun 6, 2025 at 1:26 PM Brandon McGivern <brandon@brandonmcgivern.com> wrote:

**RE: Immediate Property Access Pursuant to June 5, 2025 Agreed Order****Case No. 2025-M1-707919****Property: 6122 N Winthrop Ave Unit C, Chicago, IL 60660**

Dear Mr. Cole and Mr. Hadley:

This communication serves as formal notice pursuant to the June 5, 2025 Agreed Order entered by the Honorable Judge Corinne Heggie granting Plaintiff's Emergency Motion for Immediate Property Access and Preservation Order.

**COURT-ORDERED ACCESS - JUNE 7, 2025**

In accordance with the Agreed Order, the following personnel will access the Property on June 7, 2025, between the court-authorized hours of 8:00 AM - 5:00 PM to assess and remediate water damage:

**Primary Representative:**

- [REDACTED] (Plaintiff's Designated Representative)
- Contact: [REDACTED]
- Authority: On-site supervision and coordination of all inspection activities
- Documentation: Photo and video recording as authorized under the Court's Order

**Contractor #1 - Water Damage Assessment:**

- Company: Quality Assurance Restoration
- Arrival: 10:00 AM
- Scope: Comprehensive inspection of all affected and potentially affected areas as ordered by the Court
- Documentation: Video and photographic evidence collection for insurance and repair purposes as authorized by the Court

**Contractor #2 - Plumbing Inspection and Emergency Repair:**

- Company: Rescue Plumbing
- Arrival Window: 10:00 AM - 12:00 PM
- Scope: Inspection of water leak source and emergency repairs to prevent continuing damage
- Documentation: Video and photographic documentation of plumbing systems as necessary

**REQUIRED DEFENDANT COOPERATION:**

To ensure compliance with the Court's Order and facilitate efficient completion of the emergency assessment:

1. **Access Confirmation:** Please confirm receipt of this notice and acknowledge that access will be provided as ordered.
2. **Security Access:** If Mr. Hadley will not be present during the inspection, please provide all necessary entry codes, keys, or access credentials to ensure unimpeded entry.
3. **Animal Restraint:** Any pets or animals on the premises must be properly secured or removed to ensure contractor safety and unobstructed access.
4. **Clear Access Paths:** All areas requiring inspection must be accessible, including but not limited to:
  - Clear pathways to the second-floor bathroom (identified leak source)
  - Unobstructed access to the plumbing access panel in the upstairs bedroom closet
  - Clear sightlines and access to dining and living areas (affected areas per Defendant's June 2, 2025 report)
  - Any other areas that may require assessment for water damage

**LEGAL NOTICE:**

This access is court-ordered emergency relief. Any interference with, obstruction of, or denial of the access specified in the June 5, 2025 Agreed Order may constitute contempt of court. All documentation and assessment activities are specifically authorized under the Court's Order for insurance and repair purposes.

FILED DATE: 6/9/2025 6:23 PM 20251707919

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Please provide written confirmation of compliance with this court-ordered access by 5:00 PM on June 6, 2025.

Respectfully,

Brandon McGivern  
Pro Se Plaintiff

[Redacted]

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Brandon McGivern  
Web Developer / Graphic Designer

[Redacted]

--  
Sincerely,

Mason Cole  
Cole Sadkin, LLC  
[www.colesadkin.com](http://www.colesadkin.com)  
Office: (312) 548-8610  
1652 W. Belmont Avenue, Suite 1, Chicago, IL 60657  
244 Fifth Avenue, Suite M297, New York, NY 10001

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Kyle Hadley [Redacted]@gmail.com>  
To: Mason Cole <mcole@colesadkin.com>  
Cc: Brandon McGivern [Redacted], [Redacted]

Fri, Jun 6, 2025 at 6:21 PM

Yes, I will be present to provide access.

Best,  
Kyle Hadley  
[Redacted]  
@KyleSellsChi

On Jun 6, 2025, at 5:20 PM, Mason Cole <mcole@colesadkin.com> wrote:

[Quoted text hidden]

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Brandon McGivern [Redacted]  
To: Kyle Hadley [Redacted]@gmail.com>  
Cc: Mason Cole <mcole@colesadkin.com> [Redacted]

Sat, Jun 7, 2025 at 1:30 PM

PLUMBER STATUS UPDATE - JUNE 7, 2025

Dear Mr. Cole and Mr. Hadley:

This serves as an update to our court-ordered access notice for today's emergency property inspection.

**Contractor #1 Status:** Quality Assurance Restoration arrived at 10:00 AM as scheduled and has completed their water damage assessment.

**Contractor #2 Status:** Rescue Plumbing did not arrive during their promised 10:00 AM - 12:00 PM window. After multiple calls with their dispatch center, they have guaranteed arrival between **12:30 PM - 1:00 PM** today.

All other provisions of the June 5, 2025 Agreed Order remain in effect. The plumbing inspection and emergency repairs will proceed immediately upon their arrival to prevent continuing water damage as authorized by the Court.

Respectfully,

Brandon McGivern  
*Pro Se Plaintiff*

[Redacted signature]

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Brandon McGivern  
Web Developer / Graphic Designer

[Redacted contact information]

[Quoted text hidden]

FILED DATE: 6/9/2025 6:23 PM 20251707919