


FILED
7/3/2025 9:30 AM
Mariyana T. Spyropoulos
CIRCUIT CLERK
COOK COUNTY, IL
2025CH05527
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**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
CHANCERY DIVISION**

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

Case No. 2025-CH-05527
Judge Eve M. Reilly
Courtroom 2405

CERTIFICATE OF SERVICE

To: Brandon McGivern
5701 N Sheridan Rd, #23G
Chicago, IL 60660


The undersigned certifies that on July 3, 2025 the above-named individual(s) were served with a copy of the following:

- *Plaintiff's Responses to Defendant's Requests to Admit*

Date: July 3, 2025

Respectfully Submitted,

By: /s/ Mason S. Cole
Mason S. Cole

COLE SADKIN, LLC
Mason S. Cole
1652 West Belmont Avenue, Suite 1
Chicago, IL 60657
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T: (312) 548-8610
mcole@colesadkin.com
Cook County Firm ID No. 49001

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AFFIDAVIT OF SERVICE

I certify that I served this Notice and its attachments by mailing and/or emailing a copy to each person to whom it is directed at the address(es) indicated above on July 3, 2025.

/s/Carly Brandt

Cole Sadkin, LLC

Mason S Cole

1652 W Belmont Ave, Ste 1

Chicago, IL 60657

(312) 548-8610

Firm ID: 49001

mcole@colesadkin.com

Counsel for Plaintiff

Response: Denied. Plaintiff made multiple payments toward the purchase, including payments made in March and April 2025, which are documented through communications and acknowledged by Defendant.

3. Admit that Plaintiff failed to vacate the Property after receiving the May 16, 2025 60-day notice.

Response: Admitted in part. Plaintiff remained in possession of the Property, but disputes that the May 16, 2025 notice was valid in light of the parties' ongoing purchase agreement and Plaintiff's reliance and performance thereunder.

4. Admit that Plaintiff has no recorded interest in the Property with the Cook County Recorder of Deeds.

Response: Admitted.

5. Admit that Defendant Brandon McGivern initiated Case No. 25-M1-707919 in the Cook County Law Division against Plaintiff for eviction.

Response: Admitted, though Plaintiff asserts that the filing was retaliatory and in bad faith.

6. Admit that Defendant's Emergency Motions filed in this case sought possession or access to the Property.

Response: Admitted.

7. Admit that the subject Property was listed for sale in January 2025 for a price higher than the price Plaintiff alleges in his Complaint.

Response: Denied. Defendant did not list the Property for sale until after Plaintiff had already made payments and performed in furtherance of their agreement. Any later pricing does not alter the parties' prior understanding.

8. Admit that no deed was executed by Defendant in favor of Plaintiff.

Response: Admitted.

9. Admit that Plaintiff continued to occupy the Property without paying rent from May 2025 to July 2025.

Response: Denied. Plaintiff continued to make payments in good faith based on the ongoing purchase arrangement. Plaintiff disputes that rent, as opposed to purchase installments, was ever owed.

10. Admit that Defendant never cashed a check tendered by Plaintiff on or around June 1, 2025.

Response: Admitted.

Respectfully submitted,

KYLE HADLEY

By: /s/Mason Cole

Cole Sadkin, LLC
1652 W. Belmont
Chicago, Illinois 60657
(312) 548-8610
mcole@colesadkin.com
Cook County Attorney No. 49001
Counsel for Plaintiff

eSignature Details

Signer ID:	jUwgVC11ashVJgqGDEeCBRpU
Signed by:	Kyle Hadley
Sent to email:	kylewhadley@gmail.com
IP Address:	172.224.237.254
Signed at:	Jul 2 2025, 5:12 pm CDT