

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CHANCERY DIVISION

FIX WILSON YARD, INC. and JUDITH A. PIER,  
D. RICHARD QUIGLEY, JUDY GLAZEBROOK,  
KATHERINE BOYDA, LUKAS CEHA, and PAT  
REUTER,

Plaintiffs,

v.

CITY OF CHICAGO; WILSON YARD  
DEVELOPMENT I, LLC; WILSON YARD  
PARTNERS, L.P.; WILSON YARD DEVELOPMENT  
CORPORATION; WILSON YARD SENIOR  
HOUSING, L.P.; WILSON YARD SENIOR  
DEVELOPMENT CORPORATION; and WILSON  
YARD RETAIL I, LLC.

Defendants.

Case No. 08 CH 45023

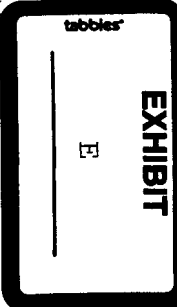
Judge Mary Rochford

**PLAINTIFF JUDY GLAZEBROOK’S RESPONSE TO  
THE WILSON YARD DEFENDANTS’ FIRST SET OF INTERROGATORIES**

Plaintiff Judy Glazebrook, by and through her attorneys, responds to the Wilson Yard Defendants’ First Set of Interrogatories as follows:

**GENERAL OBJECTIONS**

1. These General Objections are hereby incorporated by reference into the responses made with respect to each separate interrogatory. Neither the inclusion of any specific objection in response to an interrogatory, nor the failure to include any general or specific objection in response to an interrogatory shall in any way be deemed as a waiver of any general objection made herein nor that may be asserted at another date.
2. Plaintiff will respond to each interrogatory based on the best of his or her present knowledge, information and belief. Plaintiff notes the pending action is in its early stages, and its investigation is ongoing. Plaintiff reserves the right to supplement and amend his or her responses herein as discovery proceeds and further information is received.



3. Plaintiff's response to any interrogatory is not intended to waive, and does not constitute any waiver of, any objection which Plaintiff may have to the admissibility, materiality, or relevance of the information sought in the interrogatory. For any and all responses to each interrogatory, Plaintiff reserves all objections or other questions regarding the relevance, materiality, or admissibility of the information sought in the interrogatory as evidence in this suit or any other proceeding, action, or trial.

4. Plaintiff objects to the Defendants' Definitions and to each interrogatory to the extent that they seek to impose obligations beyond those required by Illinois Supreme Court Rules 201, 213 and any other applicable rules.

Subject to the foregoing General Objections, and without waiver of these objections, Plaintiff responds as follows:

### **INTERROGATORIES**

1. Identify the person answering these interrogatories.

**ANSWER:** Judy Glazebrook, 4325 N. Kenmore Avenue, Chicago, Illinois 60613.

2. Identify all names that you have used, other than the name listed on the complaint, including but not limited to names used to post a comment related to the Wilson Yard development or Uptown development on websites, blogs or in chat rooms.

**ANSWER:** Plaintiff objects to this interrogatory as irrelevant, overly broad and not reasonably calculated to lead to the discovery of admissible evidence.

3. Identify what you do for a living, and what your spouse or partner does for a living.

**ANSWER:** Self-employed. Sells books to schools.

4. Identify all community, political or social organizations of which you are a member or financial supporter, who have expressed an opinion on the Wilson yard development

or Uptown development. For each such organization, provide the name, business address, phone number and website (if one exists).

**ANSWER:** Plaintiff objects to this interrogatory as irrelevant, overly broad and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving said objections: I am a member of the following organizations: Buena Park Neighbors, P.O. Box 13018, Chicago, IL 60613, [www.buenaparkneighbors.org](http://www.buenaparkneighbors.org), Uptown Chicago Commission, 937 W. Lakeside, Chicago, IL 60640, telephone: 773-338-7141, [www.uptownchicagocommission.org](http://www.uptownchicagocommission.org), Uptown Neighborhood Council, P.O. Box 13324, Chicago, IL 60613, [www.uncchicago.org](http://www.uncchicago.org). I am the treasurer of Plaintiff Fix Wilson Yard, Inc.

5. Identify all websites, blogs, and chat rooms where you have posted a comment of any type about the Wilson Yard development or Uptown development. For each such site, blog or chat room, give the name, its url address, and the owner of the site, blog or chat room.

**ANSWER:** Plaintiff objects to this interrogatory as irrelevant, overly broad and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving said objections: To the best of my memory I have posted on the following websites and blogs: Buena Park Neighbors [www.buenaparkneighbors.org](http://www.buenaparkneighbors.org). I believe the owner is Buena Park Neighbors Organization. Uptown Update [www.uptownupdate.com](http://www.uptownupdate.com). I don't know the owner of this site.

6. Identify any real estate, real estate brokerage, development or construction companies in which you have a financial interest or for which you are employed. For each such firm, provide the name, business address and phone, and describe the nature of your interest.

**ANSWER:** Plaintiff objects to this interrogatory as irrelevant, overly broad and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving said objections: None.

7. Identify all letters to the editor, website posts, blog posts, chat room posts, blog comments, chat room comments, written or oral testimony, written documents prepared that relate to the Wilson Yard development or development in Uptown.

**ANSWER:** Plaintiff objects to this interrogatory as irrelevant, overly broad and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, information on the internet is readily available to the public and the defendants. Without waiving said objections: I will produce documents in my possession and control containing responsive information.