

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

Lisa Stone, as mother and next friend of)
Jed Stone, a minor,)
Petitioner,)
vs.)
Paddock Publications, Inc., d/b/a The Daily)
Herald, Inc.)
Respondent.)

No. 2009L005636
CALENDAR/ROOM D
TIME 00:00
Discovery

PETITION FOR DISCOVERY

NOW COMES the Petitioner, Lisa Stone, mother and next friend of Jed Stone, a minor, by and through her attorney, Levin Riback Law Group, and seeks discovery from the Respondent, Paddock Publications, Inc., pursuant to Illinois Supreme Court Rule 224 and in support thereof, states as follows:

1. On or about April 6, 2009 an article was published by the Respondent and was available on the Daily Herald web site. Said article clarified the Daily Herald endorsements for the trustee election in Buffalo Grove, Illinois.
2. The online version of the article permitted comments to be made about the article by the public and permitted anyone who wished to write and read the comments to do so by signing in.
3. On or about April 9, 2009 a comment was posted on this public forum by Hipcheck16 directed to the minor Petitioner that was defamatory.
4. It is necessary to ascertain the identity of Hipcheck16, as he is a potential defendant for his defamatory remarks.

5. Upon information and belief, the Respondent herein possesses the name and address of the offender, Hipcheck16, and the Petitioner seeks that information from the Respondent herein.

6. The discovery sought would be in the form of interrogatories and notice to produce and if the information is not forthcoming from written discovery a deposition may be necessary.

WHEREFORE, the Petitioner, Lisa Stone, mother and next friend of Jed Stone, a minor, prays that this Court enter an order authorizing the Petitioner to obtain the discovery requested herein to identify potential parties and/or entities.

Lisa Stone, mother and next friend of Jed Stone, a minor,

Levin Riback Law Group

By: 

One of the attorneys for Petitioner

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