

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, PROBATE DIVISION**

In the Estate of Joseph Ziarnik,
Plaintiff,

v.

No. 08 P 8140

Tami Goldmann,
Defendant.

**DEFENDANT'S ANSWER TO COMPLAINT
AND AFFIRMATIVE DEFENSES TO PLAINTIFFS
(JANNA DUTTON, JOSH MITZEN, RICHARD BLOCK AND SALLY GRIFFIN)**

FIRST AMENDED COMPLAINT

NOW COMES Defendant, Tami Goldmann, pro se, for her ANSWER and
AFFIRMATIVE DEFENSES to Plaintiffs First Amended Complaint and states as follows:

INTRODUCTION

This lawsuit is a sham and only being utilized so the Plaintiff's can profit and exhaust the Estate of Mr. Ziarnik. The Defendant set up a website and blog describing, in detail, the abuse she witnessed the Plaintiffs inflict on a wealthy elderly man. She explained how the Plaintiff, Ms. Dutton utilizes her clients own funds to surround him with her paid employees only to profit and promote herself. Ms. Dutton traps the elder in guardianship, writes his Trust to benefit her, hires her colleagues to exploit him only to become sole heir by abusing the judicial process. This lawsuit is an example of that abuse and further lends credibility to what Ms. Goldmann wrote online.

ANSWER TO COMPLAINT

1. Paragraph 1 contains no allegations against the Defendant therefore, no response is required. If an answer is required, Defendant denies the allegations in paragraph 1.

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Smith,Philip Loring Spooner,Obadiah Milton Conover,Frederic King Conover,1882 **Fundamentals of Litigation for Paralegals** Thomas A. Mauet,Marlene A. Maerowitz,1996 Enlivened with color and numerous visual aids Tom Mauet and Marlene Maerowitz s highly successful text for litigation features comprehensive material in a very teachable format In three coherent parts investigating and Planning the Litigation Pretrial Litigation and Settlement Trial and Post Trial trial expert Thomas Mauet an paralegal educator Marlene Maerowitz clearly and thoroughly explain the steps paralegals must follow to assist lawyers in civil lawsuits from initial fact gathering through post judgment proceeding Including the latest changes in the Federal Rules of Civil Procedure The authors discuss and demonstrate the full range of litigation skills from drafting litigation documents motion pleadings discovery request and collecting data to interviewing clients and taking witness statements In addition To The new attractive design Fundamentals of Litigation for paralegals Second Edition Features Chapters on provisional remedies appeals and alternative dispute resolution numerous visual aids chart forms exhibits and more to enhance student understanding key terms highlighted throughout the text and further explained in a comprehensive glossary chapter objectives and summaries that preview and review important points review questions to test understanding of the main concepts a litigation file which follows and illustrates the complete litigation process including forms complaints etc for one sample case This invaluable teaching tool not only helps students master the concepts of the litigation process but also serves as a handy reference in practice An updated Workbook and Instructor s Guide complete this superb package Filled with questions and brief writing assignments The Workbook gives students an opportunity to research statutes and become familiar with pertinent forms The Instructor s guide provides guidance on using the text and Workbook **Mason and Hoguet's Supplement to Brightly's New York Digest** Herbert Delavan Mason,1907 **Government Contracts Practice** State Bar of California. Committee on Continuing Education of the Bar,1964 Pretrial Thomas A. Mauet,1993

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