

**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.

# Answer To Contract Complaint Sample

**Hussin A.Rothana**



## **Answer To Contract Complaint Sample:**

**Board of Contract Appeals Decisions** United States. Armed Services Board of Contract Appeals, 1974 Labor Relations Forms & Agreements, 1987 **Employee Dismissal Law** Allen J. Gross, 1992 **Paralegal Litigation** Marcy Fawcett-Delesandri, 2000-12-01 A handbook for paralegals this book contains the forms pleadings and instructions needed to successfully handle most types of litigation Fawcett Delesandri herself a paralegal provides model interrogatories demand letters sample motions checklists and practice tips as well as information on meeting with clients and witnesses preparing exh

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**A Treatise on the Law of Contracts** Samuel Williston, 1957 *ISC Business Studies for Class XII (A.Y. 2023-24) Onward* Dr. C.B. Gupta, 2023-05-20 The council for the Indian School Certificate Examination New Delhi has thoroughly revised the syllabus of Business Studies for ISC Class XII The new syllabus is in line with the changing business environment in India characterised by start up entrepreneurship digitalisation cashless payment mechanism online business etc Both the students and the teachers feel an acute need for a high quality textbook as per the new syllabus This book is designed and written to meet this need According to the council for the Indian School Certificate Examinations the aims of teaching Business Studies at the XII standard are as follows 1 To enable candidates to understand the modern business environment and to create awareness about various entrepreneurial opportunities 2 To awaken a spirit of enterprise amongst candidates 3 To provide an insight into the recent trends in business 4 To acquaint candidates with the various aspects of Human Resource Management 5 To provide knowledge and understanding of communication in modern business 6 To identify the various sources of business finance and the role of

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**The American State Reports** Abraham Clark Freeman,1892     *The Northwestern Reporter* ,1900     Reports of Cases Argued and Determined in the Supreme Court of the State of Wisconsin Wisconsin. Supreme Court,Abram Daniel

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

**Litigation Guide for Paralegals** Cynthia M. Osborne,1994     Bender's Uniform Commercial Code Service: Sales and bulk transfers under the U. C. C. ,1963     **Board of Contract appeals decisions** ,1979     *Legal Research and Writing* Carol M. Bast,1995 With this book students learn to perform legal research in the law library and on the computer use correct citation form communicate clearly and eliminate mechanical errors Superb teaching tools include complete samples

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