

STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE TWENTY-SECOND JUDICIAL CIRCUIT
MCHENRY COUNTY, ILLINOIS

HEROIC MEDIA, L.L.C., an)	
Illinois Limited Liability Company,)	
KERRI BARBER, and)	
KATHERINE DICKINSON,)	COMPLAINT
)	
Plaintiffs,)	DAMAGES OVER \$50,000.00
)	
v.)	
)	
MICHAEL BISSET, PAULA YENSEN,)	
KRISTINA ZAHORIK, and)	
NANCY ZETTLER,)	
)	
Defendants.)	

COMPLAINT

NOW COME the Plaintiffs HEROIC MEDIA, L.L.C. (“Heroic Media”), KERRI BARBER (“Ms. Barber”), and KATHERINE DICKINSON (“Ms. Dickinson”) (collectively “Plaintiffs”), by and through their attorneys, Mudd Law Offices, and complain of Defendants MICHAEL BISSET (“Defendant Bisset”), PAULA YENSEN (“Defendant Yensen”), KRISTINA ZAHORIK (“Defendant Zahorik”), and NANCY ZETTLER (“Defendant Zettler”) (collectively “Defendants”), and state as follows:

NATURE OF ACTION

1. This is an action for defamation *per se*, false light, commercial disparagement, tortious interference with business relations, and violation of the Uniform Deceptive Trade Practices Act.

2. By this action, the Plaintiffs seek compensatory damages, punitive damages, injunctive relief, statutory legal fees and costs, and all other relief to which they may be entitled as a matter of law.

PARTIES

3. HEROIC MEDIA, LLC is an Illinois Limited Liability Company with a principal place of business in McHenry County, Illinois.

4. KERRI BARBER is a citizen of the State of Illinois and a resident of McHenry County, Illinois.

5. KATHERINE DICKINSON is a citizen of the State of Illinois and a resident of McHenry County, Illinois.

6. MICHAEL BISSET is a citizen of the State of Illinois and a resident of McHenry County, Illinois.

7. PAULA YENSEN is a citizen of the State of Illinois and a resident of McHenry County, Illinois.

8. KRISTINA ZAHORIK is a citizen of the State of Illinois and a resident of McHenry County, Illinois.

9. NANCY ZETTLER is a citizen of the State of Illinois and a resident of McHenry County, Illinois.

JURISDICTION AND VENUE

6. This Court has jurisdiction over the Defendants as they are all Illinois citizens and reside in McHenry County, Illinois.

7. Additionally, this Court possesses jurisdiction over the Defendants as they engaged in most, if not all, of their wrongful conduct in McHenry County.

6. Furthermore, this Court may exercise personal jurisdiction over the Defendants because they directed their activities to harm the Plaintiffs in McHenry County.

7. Venue is proper as the Defendants reside in McHenry County and most of the conduct at issue occurred within McHenry County.

8. Jurisdiction and venue are also proper in McHenry County because the Defendants directed their conduct and communications to people within McHenry County who might hire the Plaintiffs and, by doing so, sought to harm the Plaintiffs in McHenry County.

9. An actual case or controversy has arisen between the Parties.

10. The Defendants engaged in intentional conduct by intentionally publishing false and defamatory statements about the Plaintiffs with the knowledge the statements were false.

11. The Defendants' intentional conduct has harmed the Plaintiffs.

12. The Plaintiffs suffered damages as a result of the Defendants' conduct and continue to suffer damages resulting therefrom.

FACTUAL BACKGROUND

13. Heroic Media is a marketing agency providing marketing, public relations, social media management, and website design and management services.

14. Plaintiff Barber and Plaintiff Dickinson are the founding partners, current executive officers, and only current members of Heroic Media.

15. Defendant Bisset is the Chairman of the McHenry County Democratic Party.

16. Defendant Yensen serves on the board of the McHenry County Democratic Party as Fundraising Chair.

17. Defendant Zahorik is the Vice Chairwoman of the McHenry County Democratic Party.

18. Defendant Zahorik is the Central Committeewoman for the Illinois 14th Congressional District to the Illinois State Democratic Party.

19. Defendant Zettler is a former candidate for the Illinois House of Representatives.

20. Defendant Zettler is a current candidate for the Illinois State Senate.

21. Defendant Zettler acted as a surrogate for Lauren Underwood (“Ms. Underwood”), a candidate for the Illinois 14th Congressional District.

22. Defendant Zettler is also the current editor of the McHenry County periodical the Gold Pin Independent published on the Internet.

23. Plaintiff Barber and Plaintiff Dickinson previously contributed articles and opinions to the Gold Pin Independent.

24. Plaintiff Barber donated her time and expertise to the Gold Pin Independent to maintain its website.

25. Heroic Media routinely donates its time and services to candidates campaigning for the Democratic Party in local and national elections.

2018 Elections

26. As part of the 2018 election cycle, Heroic Media donated its time and services to Democratic candidates Jim Walz (“Mr. Walz”), Drew Georgi (“Mr. Georgi”), and Michael Vijuk (“Mr. Vijuk”).

27. On May 17, 2017, Heroic Media announced it would assist Mr. Walz’s campaign for the Illinois 14th Congressional District seat.

28. Heroic Media and Mr. Walz made the announcement in order to comply with Illinois election and ethics requirements.

29. On June 28th, 2017, Heroic Media sponsored a Congressional Candidate Panel for candidates campaigning for the Illinois 14th Congressional District and Illinois 5th Congressional District. The panel included, among other candidates, Mr. Walz.

30. Defendant Zettler agreed to moderate the panel.

31. On the day of the panel, Defendant Zettler became upset that Heroic Media sponsored the panel and donated its time and services to Mr. Walz.

32. Defendant Zettler became enraged in the auditorium and yelled that the panel constituted a conflict of interest.

33. Upon information and belief, Defendant Zettler had discussed sponsoring Ms. Underwood at the time. Defendant Zettler did not disclose this information.

34. Following the panel, Defendant Zettler advised community members and community leaders that Plaintiff Barber and Heroic Media “can not be trusted.” She further advised community members and community leaders that they “should not listen to” the Plaintiffs.

35. Defendant Zettler insisted that the contributions of Plaintiff Barber and Plaintiff Dickinson to the Gold Pin Independent also constituted conflicts of interest because of Heroic Media’s volunteer work with Mr. Walz’s campaign.

36. Yet, the Gold Pin Independent published Plaintiff Dickinson’s last contribution in July 2017.

37. The Gold Pin Independent published Plaintiff Barber’s final contribution in September 2017.

38. Nonetheless, Defendant Zettler and Plaintiff Barber agreed that Plaintiff Barber would publish a formal resignation from the Gold Pin Independent due to what Defendant Zettler perceived as a conflict of interest.

39. Plaintiff Barber formally resigned from the Gold Pin Independent due to what Defendant Zettler perceived as a conflict of interest. Plaintiff Barber's formal resignation identified Heroic Media's volunteer work for Mr. Walz as a basis for the reason.

40. Defendant Zettler did not at any point disclose to the Plaintiffs that she sponsored Ms. Underwood's campaign.

41. In September 2017, a local unitarian church invited Mr. Walz to speak to the congregation as part of his campaign.

42. Defendant Bisset and Defendant Yensen attend the unitarian church Mr. Walz visited.

43. As Mr. Walz entered the church, Defendant Yensen stepped in front of him and yelled that he should not work with the Plaintiffs.

44. Following Mr. Walz's visit to the church, Defendant Bisset and Defendant Zahorik told a colleague of the Plaintiffs that Defendant Barber was "ungrateful", "a terrible candidate" when she previously ran for office, that the Plaintiffs' work was "hurting the party," and that comments from Plaintiff Barber seeking greater transparency in the party were "divisive" and personally offensive.

45. For the sake of Mr. Walz's campaign, and in an attempt to prevent the situation from escalating, Plaintiff Barber sent Defendant Bisset an email offering to talk about what made her seem "ungrateful."

46. During the call, Defendant Bisset accused Plaintiff Barber of posting on the Internet confidential party information provided to Plaintiff Barber by her husband, who served on the McHenry County Democratic Board and as a District Chair.

47. Plaintiff Barber denied this accusation as she had not posted confidential information on the Internet.

48. Defendant Bisset demanded she make a formal apology before the entire party.

49. Plaintiff Barber refused. Instead, she offered to speak before the party about the need for progressive and centrist Democrats to work together. Defendant Bisset agreed, and Plaintiff Barber spoke before the party on that topic.

50. Following the meeting, Defendant Bisset and Defendant Zahorik both approached Mr. Walz and stated that Plaintiff Barber lied to them and encouraged him to “fire” the Plaintiffs.

51. Ms. Underwood formally entered the race following Ms. Barber's speech. Defendant Zettler publicly stated to Democratic Party members that Plaintiff Barber previously called Ms. Underwood “a Republican,” that Plaintiff Barber had been speaking against Ms. Underwood, and that Plaintiff Barber “could not be trusted.”

52. Following this incident, upon information and belief, the Defendants began a “whisper campaign” against the Plaintiffs.

53. Due to the “whisper campaign,” Heroic Media lost a contract with Ruth Scifo, an accountant they sought to hire.

Defendants Attack Family Member

54. On October 1, 2017, Plaintiff Barber’s husband, as a district chair, hosted a meeting of all the Precinct Committee Persons for his district.

55. On the same day, Defendant Bisset scheduled an emergency Democratic Party Board meeting.

56. Plaintiff Barber's husband attended by phone.

57. Defendant Bisset only distributed the agenda to in-person attendees. The agenda included a motion to remove Plaintiff Barber's husband as a board member.

58. Defendant Bisset falsely stated that Plaintiff Barber's lies were the reason for removing Plaintiff Barber's husband as a board member.

59. Defendant Bisset falsely stated that Plaintiff Barber improperly used her Vote Builder access. Improperly using such access constitutes an ethics violation.

60. Defendant Bisset falsely stated that Heroic Media profited from the candidates for whom it volunteered stating that the Plaintiffs "fleeced" candidates.

61. Defendant Bisset requested that Plaintiff Barber's husband step down. He refused to do so.

Voluntary Audit

62. On October 17, 2017, Defendant Bisset removed many precinct committee members, including Plaintiff Barber. Following these removals, Defendant Bisset held a vote to remove Plaintiff Barber's husband. Following the vote, Plaintiff Barber's husband was removed as district chair.

63. Defendant Barber sent a letter explaining these events to the removed precinct committee members (attached hereto as Exhibit A).

64. Many removed precinct committee members were reinstated following the vote and the appointment of a new District 1 Chairman. Plaintiff Barber was not reinstated.

65. In October 2017, the Plaintiffs voluntarily hired independent auditors to review Heroic Media's finances including its volunteer work for candidates.

66. The independent auditors concluded that Heroic Media properly and ethically conducted its business and volunteer work for candidates.

67. On October 5, 2017, the Plaintiffs sent a letter to Defendant Bisset and Defendant Zahorik advising that the statements made by board members and others were untrue, advising them of the findings of the independent auditor, and advising them that the false statements damaged the Plaintiffs' reputation and the reputation of the candidates for whom they volunteered (attached hereto as Exhibit B).

November 2017 Statements

68. In November 2017, Defendant Zahorik made public statements about the Plaintiffs at a Democratic Party Meeting.

69. Defendant Zahorik stated Plaintiff Barber lied.

70. Defendant Zahorik stated Plaintiff Barber spread false information about the Democratic Party.

71. Defendant Zahorik stated Plaintiff Barber provided false advice to candidates.

72. Local Democratic Party leaders withheld support from one of the Plaintiffs' candidates, Mr. Georgi, unless he agreed to sever ties with the Plaintiffs.

73. The Plaintiffs severed ties with Mr. Georgi so that he would not be harmed.

74. Local Democratic Party leaders told another of the Plaintiffs' candidates, Mr. Vijuk, that he was "tainted" by working with the Plaintiffs. The Democratic Party withheld tools and resources from Mr. Vijuk because he worked with the Plaintiffs.

75. The Plaintiffs severed ties with Mr. Vijuk, again, so that he would not be harmed.

Intent and Actual Malice

76. The Defendants acted with intent and actual malice when they engaged in the foregoing conduct because they intended to harm the Plaintiffs.

77. The foregoing wrongful conduct engaged in by the Defendants shall hereinafter be referred to as the “Wrongful Conduct.”

COUNT ONE

AS AND FOR A FIRST CAUSE OF ACTION

DEFAMATION PER SE

78. The Plaintiffs hereby incorporate by reference Paragraphs 1 through 77 above in this First Count as though fully set forth herein.

79. The Defendants published the false statements described above to third parties.

80. The Defendants’ statements falsely portray the Plaintiffs as dishonest.

81. The Plaintiffs are not dishonest.

82. The Defendant’s statements falsely portray the Plaintiffs as untrustworthy.

83. The Plaintiffs are not untrustworthy.

84. The Defendants’ statements falsely portray the Plaintiffs as liars.

85. The Plaintiffs are not liars.

86. The Defendants’ statements falsely portray the Plaintiffs as unethical and engaging in unethical conduct.

87. The Plaintiffs are not unethical.

88. The Plaintiffs do not engage in unethical conduct.

89. The Defendants’ statements falsely portray the Plaintiffs as improperly charging and, indeed, overcharging or “fleecing” the candidates with whom they work and have worked.

90. The Plaintiffs do not charge the candidates with whom they work or have worked.
91. The Plaintiffs donate their time and services to candidates properly and in accordance with all appropriate ethical rules.
92. The Defendants' false statements falsely portray the Plaintiffs as lacking ability in their business and profession.
93. The Plaintiffs do not lack ability in their business and profession.
94. The Defendants' falsely impute that the Plaintiffs' lack integrity in their business and profession.
95. The Plaintiffs conduct their business and have always conducted their business, with integrity and professionally.
96. The Defendants identified the Plaintiffs by name.
97. Persons other than the Parties would have and actually have reasonably understood the Defendants' statements related to and were about the Plaintiffs.
98. The Defendants presented their false statements as statements of fact.
99. The Defendants' statements represent the publication of false and defamatory statements of fact about the Plaintiffs.
100. The Defendants' statements were unprivileged.
101. Alternatively, the Defendants abused any privilege by knowingly publishing false statements about the Plaintiffs.
102. The Defendants made their statements with actual malice knowing the falsity of their statements.
103. Indeed, the Plaintiffs informed Defendant Bisset and Defendant Zahorik of the falsehoods contained in their statements and the statements of the other Defendants, both of

whom were board members under Defendant Bisset and Defendant Zahorik. The Defendants continued to publish their wrongful statements their falsity.

104. Based on the foregoing, the Defendants' false statements constitute defamation *per se*.

105. Since the Defendant's Wrongful Conduct began, the Plaintiffs suffered and continue to suffer damages including, but not limited to, harmed reputation, loss of business, loss of profits, loss of revenue, and loss of goodwill.

106. WHEREFORE, the Plaintiffs seek an award of compensatory and punitive damages arising from the Defendants' *per se* defamation of them.

COUNT TWO

AS AND FOR A SECOND CAUSE OF ACTION

(BY KERRI BARBER AND KATHERINE DICKINSON)

FALSE LIGHT

107. Plaintiffs Barber and Dickinson hereby incorporates by reference Paragraphs 1 through 77 above in this Second Count as though fully set forth herein.

108. The Defendants' statements falsely portray the Plaintiff Barber and Plaintiff Dickinson as dishonest.

109. Plaintiff Barber and Plaintiff Dickinson are not dishonest.

110. The Defendant's statements falsely portray Plaintiff Barber and Plaintiff Dickinson as untrustworthy.

111. Plaintiff Barber and Plaintiff Dickinson are not untrustworthy.

112. The Defendants' statements falsely portray the Plaintiff Barber and Plaintiff Dickinson as liars.

113. Plaintiff Barber and Plaintiff Dickinson Plaintiffs are not liars.

114. The Defendants' statements falsely portray Plaintiff Barber and Plaintiff Dickinson as unethical and engaging in unethical conduct.

115. Plaintiff Barber and Plaintiff Dickinson are not unethical.

116. Plaintiff Barber and Plaintiff Dickinson do not engage in unethical conduct.

117. The Plaintiffs donate their time and services to candidates properly and in accordance with all appropriate ethical rules.

118. The Defendants' false statements falsely portray the Plaintiff Barber and Plaintiff Dickinson as lacking ability in their business and profession.

119. Plaintiff Barber and Plaintiff Dickinson do not lack ability in their business and profession.

120. The Defendants' falsely impute that the Plaintiff Barber and Plaintiff Dickinson lack integrity in their business and profession.

121. Plaintiff Barber and Plaintiff Dickinson conduct their business and have always conducted their business with integrity.

122. The Defendants identified the Plaintiff Barber and Plaintiff Dickinson by name.

123. As founding partners, current executive officers, and only current members of Heroic Media, statements about Heroic Media are, in fact, statements about Plaintiff Barber and Plaintiff Dickinson.

124. Persons other than the Parties would have and actually have reasonably understood the Defendants' false statements related to and were about the Plaintiffs.

125. The Defendants directed their false statements to third parties.

126. By publishing their statements to the McHenry Democratic Party and the local community, the Defendants published their statements to a widespread audience.

127. The Defendants presented their false statements as statements of fact.

128. The Defendants' statements represent the publication of false statements of fact about Plaintiff Barber and Plaintiff Dickinson.

129. The Defendants' statements are, and would be considered, highly offensive to a reasonable person.

130. The Defendants made their statements with actual malice knowing the falsity of their statements.

131. Indeed, the Plaintiff Barber and Plaintiff Dickinson informed Defendant Bisset and Defendant Zahorik of the falsehoods contained in their statements and the statements of the other Defendants, both of whom were board members under Defendant Bisset and Defendant Zahorik. The Defendants continued to publish their wrongful statements their falsity.

132. Since the Defendant's Wrongful Conduct began, the Plaintiffs suffered and continue to suffer damages including, but not limited to harmed reputation.

133. WHEREFORE, Plaintiff Barber and Plaintiff Dickinson seek an award of compensatory and punitive damages arising from the Defendants portrayal of them in a false light.

COUNT THREE

AS AND FOR A THIRD CAUSE OF ACTION

TORTIOUS INTERFERENCE WITH BUSINESS RELATIONS

134. The Plaintiffs hereby incorporate by reference Paragraphs 1 through 77 above in this Third Count as though fully set forth herein

135. Before and after the Defendant's Wrongful Conduct, the Plaintiffs possessed valuable relationships with clients and contractors.

136. The Plaintiffs possessed a reasonable expectancy of entering into additional business relationships with clients and contractors to maintain and grow their business.

137. The Defendants knew of the Plaintiffs' current business relationships and their expectancy to enter into business relationships with third parties.

138. The Defendants engaged in their Wrongful Conduct, including publishing their false statements, to harm the Plaintiffs

139. The Defendants expressly intended to direct third parties away from doing business with the Plaintiffs.

140. As a result of the Defendants' Wrongful Conduct, the Plaintiffs have lost contracts with contractors including, but not limited to, their contract with accountant Ruth Scifo.

141. Additionally, since the Defendants began engaging in their Wrongful Conduct, the Plaintiffs have lost clients including, but not limited to, Mr. Georgi and Mr. Vijuk.

142. As a direct and proximate result of Defendants' conduct, the Plaintiffs suffered harm in the form of lost profits and loss of potential opportunities.

143. WHEREFORE, the Plaintiffs seek compensatory and punitive damages arising from the Defendants' tortious interference with their business relations as well as any and all other relief this Court may deem just and appropriate.

COUNT FOUR

AS AND FOR A FOURTH CAUSE OF ACTION

(BY HEROIC MEDIA, L.L.C.)

COMMERCIAL DISPARAGEMENT

144. Plaintiff Heroic Media hereby incorporate by reference Paragraphs 1 through 77 above in this Fourth Count as though fully set forth herein.

145. The Defendants published numerous false statements about Plaintiff Heroic Media to third parties.

146. The Defendants expressly intended to direct third parties away from doing business with Plaintiff Heroic Media.

147. The Defendants published their false statement with the intent to cause harm and financial loss to Plaintiff Heroic Media.

148. Plaintiff Heroic Media suffered financial harm as a result of the Defendant's false statements.

149. The Defendants made their statements with actual malice knowing the falsity of their statements.

150. Indeed, the Plaintiffs informed Defendant Bisset and Defendant Zahorik of the falsehoods contained in their statements and the statements of the other Defendants, both of whom were board members under Defendant Bisset and Defendant Zahorik. The Defendants continued to publish their wrongful statements their falsity.

151. Since the Defendants began to engage in their Wrongful Conduct, Plaintiff Heroic Media suffered and continue to suffer damages including but not limited to harmed reputation, loss of business, loss of profits, loss of revenue, and loss of goodwill.

152. WHEREFORE, Plaintiff Heroic Media seeks compensatory and punitive damages arising from the Defendants' commercial disparagement of it.

COUNT FIVE

AS AND FOR A FIFTH CAUSE OF ACTION

VIOLATION OF THE UNIFORM DECEPTIVE TRADE PRACTICES ACT

(815 ILCS § 510/1, et seq.)

153. The Plaintiffs hereby incorporate by reference Paragraphs 1 through 77 above in this Fifth Count as though fully set forth herein.

154. The Defendants' false statements constituted numerous false or misleading representation of fact.

155. The Defendants' false statements disparaged and continue to disparage the business of the Plaintiffs.

156. The Defendants expressly intended to direct third parties away from doing business with the Plaintiffs.

157. The Defendants made their false statements in the course of their business as ranking members of the Democratic Party.

158. The Defendants made their false statements willfully with actual malice knowing the falsity of their statements.

159. Indeed, the Plaintiffs informed Defendant Bisset and Defendant Zahorik of the falsehoods contained in their statements and the statements of the other Defendants, both of whom were board members under Defendant Bisset and Defendant Zahorik. The Defendants continued to publish their wrongful statements their falsity.

160. Based on the forgoing, the Defendants violated the Illinois Deceptive Trade Practices Act, specifically 815 ILCS § 510/2(a)(8).

161. Since the Defendant's Wrongful Conduct began, the Plaintiffs suffered and continue to suffer damages including, but not limited to, harmed reputation, loss of business, loss of profits, loss of revenue, and loss of goodwill.

162. WHEREFORE, based upon the Defendants' violation of the Uniform Deceptive Trade Practices Act, the Plaintiffs seek:

- A. Injunctive relief enjoining the Defendants from continuing to publish any further false or disparaging statements about the Plaintiffs;
- B. Attorneys' fees and costs to the extent that this Court determines that the Defendants willfully engaged in their conduct; and,
- C. Any such other relief to which the Plaintiffs may be entitled or as justice may require.

COUNT SIX

AS AND FOR A SIXTH CAUSE OF ACTION

VIOLATION OF THE CONSUMER FRAUD AND

DECEPTIVE BUSINESS PRACTICES ACT

(815 ILCS § 505/1, et seq.)

163. The Plaintiffs hereby incorporate by reference Paragraphs 1 through 77 above in this Sixth Count as though fully set forth herein.

164. Based on the forgoing, the Defendants additionally violated the Consumer Fraud and Deceptive Business Practices Act, specifically 815 ILCS § 505/2.

165. WHEREFORE, based upon the Defendants' violation of the Consumer Fraud and Deceptive Business Practices Act, the Plaintiffs seek:

- A. Economic damages in an amount to be determined by this Court;

- B. Attorney's fees and costs; and,
- C. Any such other relief to which the Plaintiffs may be entitled or as justice may require.

GENERAL

166. Where conditions precedent are alleged, the Plaintiffs aver that all conditions precedent have been performed or have occurred.

PRAYER FOR RELIEF

WHEREFORE, PLAINTIFFS HEROIC MEDIA, L.L.C., KERRI BARBER, AND KATHERINE DICKINSON accordingly and respectfully pray for judgment against DEFENDANTS MICHAEL BISSET, PAULA YENSEN, KRISTINA ZAHORIK, AND NANCY ZETTLER as follows:

1. That PLAINTIFFS HEROIC MEDIA, L.L.C., KERRI BARBER, AND KATHERINE DICKINSON be awarded compensatory damages in an amount to be determined at trial;

2. That PLAINTIFFS HEROIC MEDIA, L.L.C., KERRI BARBER, AND KATHERINE DICKINSON be awarded punitive damages in an amount to be determined at trial;

3. That PLAINTIFFS HEROIC MEDIA, L.L.C., KERRI BARBER, AND KATHERINE DICKINSON be awarded reasonable attorney's fees, paralegal fees, costs, expenses, and other such fees relating to the breach of contract claim, in an amount to be determined at trial;

4. That PLAINTIFFS HEROIC MEDIA, L.L.C., KERRI BARBER, AND KATHERINE DICKINSON be awarded the injunctive relief sought; and,

5. That PLAINTIFFS HEROIC MEDIA, L.L.C., KERRI BARBER, AND KATHERINE DICKINSON be awarded any such other and further relief as this Court may deem just and proper or to which Plaintiffs may be entitled as a matter of law and equity.

Dated: Chicago, Illinois

April 18, 2018

Respectfully Submitted

PLAINTIFFS,
HEROIC MEDIA, L.L.C.,
KERRI BARBER, and,
KATHERINE DICKINSON

s/Michelle A. Kuipers

By: One of Their Attorneys

Michelle A. Kuipers

MUDD LAW OFFICES

3114 West Irving Park Road

Suite 1W

Chicago, Illinois 60618

773.588.5410 Telephone

773.588.5440 Facsimile

Illinois ARDC: 6320955

michelle@muddlaw.com