

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

DAIMLERCHRYSLER FINANCIAL SERVICES  
AMERICAS LLC, f/k/a DaimlerChrysler Services  
North America LLC, Plaintiff

v.

No. 03-CV-00760

GERALD W. GORMAN, an individual, &  
ELIZABETH A. GORMAN, an individual,  
Counterclaim Defendants and Judgment Debtors,

The Gorman Good Government Group, Third Party Respondent

**CITATION TO DISCOVER ASSETS TO THIRD PARTY**

To: The Gorman Good Government Group, c/o Elizabeth Gorman, 10834 Carolyn Court, Orland Park, Illinois 60467-4556  
c/o Margaret Walsh, Treasurer, 3547 S. Emerald Street, Chicago, Illinois 60609 and  
Carolyn Doody, Chairwoman, 12543 S. 73rd Ave., Palos Heights, Illinois 60463

YOU ARE REQUIRED to file your answer to this Citation on the form appearing on the reverse side prior to January 15, 2010 in our offices located at 55 E. Monroe Street, 37th Floor, Chicago, Illinois 60603. Please deliver a copy of your answer to this Citation before January 15, 2010 to the undersigned counsel for Judgment Creditor DaimlerChrysler Financial Services Americas, LLC f/k/a Daimler Chrysler Services North America LLC. You are also required to appear before the undersigned at the offices of Thompson Coburn LLC, 55 E. Monroe, Suite 3700, Chicago, Illinois, 60603, on January 22, 2010, at 9:00 a.m. to be examined under oath to discover assets or income not exempt from enforcement of a judgment.

A Judgment was entered on October 26, 2006 in favor of DaimlerChrysler Financial Services Americas LLC, f/k/a DaimlerChrysler Services North America LLC, and against Ridge Chrysler Plymouth, LLC d/b/a Marquette Chrysler Jeep, Sales, Inc., d/b/a Dodge of Midlothian, Gerald W. Gorman and Elizabeth A. Gorman in the sum of \$4,245,528.30, plus interest and costs, which remains unsatisfied.

Your answer will inform the Court as to property you may hold belonging to: Elizabeth A. Gorman or Gerald W. Gorman, or in which they have an interest.

(Judgment debtors)

YOU ARE REQUIRED to do the following upon receiving this Citation until further Order of Court in accordance with Illinois Supreme Court Rule 277(f), made applicable to this Citation by Rule 69 of the Federal Rules of Civil Procedure, or until this Citation is dismissed by the Court or by Stipulation:

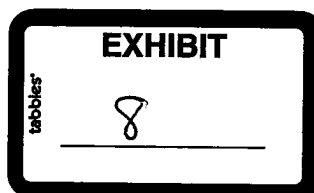
YOU ARE PROHIBITED from making or allowing any transfer or other disposition of, or interfering with, any property not exempt from execution or garnishment belonging to the judgment debtor or to which he/she may be entitled or which may be acquired by or become due to him/her, until further order of court of termination of the proceeding. You are not required to withhold the payment of any money beyond double the amount of the judgment.

**WARNING:** Your failure to comply with the citation proceeding may result in a judgment being entered against you for the unsatisfied amount of this judgment. 735 ILCS 5/2-1402(f)(1), made applicable to this Citation by Rule 69 of the Federal Rules of Civil Procedure

**WARNING:** YOUR FAILURE TO APPEAR IN COURT AS HEREIN DIRECTED MAY CAUSE YOU TO BE ARRESTED AND BROUGHT BEFORE THE COURT TO ANSWER TO A CHARGE OF CONTEMPT OF COURT, WHICH MAY BE PUNISHABLE BY IMPRISONMENT.

**CERTIFICATE OF ATTORNEY OR NON-ATTORNEY**


Note: This citation must be accompanied at the time of service by either a copy of the underlying judgment or a certification by either the clerk that entered the judgment or the attorney for the judgment creditor setting forth:



1. Judgment in the amount of: \$4,245,528.30, plus interest thereon from the date of entry.
2. Name of the Court: United States District Court for the Northern District of Illinois, Eastern Division
3. Case Number: 03-CV-00760

I, the undersigned, certify that the foregoing information is true.

Glen T. Keysor, Esq. (#01445032)  
THOMPSON COBURN LLP  
55 East Monroe Street, 37th Floor  
Chicago, IL 60603  
(312) 580-2210

  
\_\_\_\_\_  
Glen T. Keysor

\_\_\_\_\_  
Date

\_\_\_\_\_  
Michael W. Dobbins, Clerk of Court

\_\_\_\_\_  
Deputy Clerk

## DOCUMENT RIDER FOR ELIZABETH A. GORMAN

### DEFINITIONS

1. The term "Document" or "Documents" means every original (any copy of any original and any copy which differs in any way from an original, e.g., because handwritten or "blind" notes appear thereon or are attached thereto) of every writing and recording, computerized records, photographs, or other memorialization, of every kind or description, whether handwritten, typed, drawn, sketched, printed or recorded by any physical, mechanical, magnetic, optical, electronic or electrical means whatsoever, and shall include, by way of illustration only and not by way of limitation, notes, correspondence, communications of any nature, telegrams, memoranda, advertisements, books, records, analyses, notebooks, blueprints, maps, surveys, graphs, charts, plans, summaries or records or transcriptions of personal conversations or statements however made, business forms, labels, appointment books, diaries, routing slips, reports, publications, photographs, films, minutes and other formal or informal memoranda of meetings, transcripts or oral testimony or statements, reports and/or summaries of interviews, negotiations or investigations, agreements and contracts, including all modifications and/or revisions thereof, papers and forms filed with courts or other governmental bodies, notices, messages, calendar entries, brochures, pamphlets, press releases, drafts, revisions of drafts and translations of any documents, tape recordings, audio recordings, video recordings, records and dictation belts to which you now have or have had access to in the past. Any document with any marks on any sheet or side thereof, including by way of illustration only and not by way of limitation, initials, stamped indicia, any comment or any notation of any character and not part of the original text, or any reproduction thereof, is to be considered a separate document for purposes of this Rider.

2. "Person" includes any individual, business, firm, joint venture, partnership, corporation, group, association or organization, and reference to any person through these requests includes such person's agent, officer, employer, employee, representative, contractor, sub-contractor and attorney.

3. "Relate to," "relates to" or "relating to" means constitute, relating to, refer to, reflect, mention, evidence, concern, pertain to, arise out of, summarize, analyze or be logically or factually connected in any way with the matter discussed.

4. "You" and "your" refers to you and all persons acting on your behalf or under your control.

### INSTRUCTIONS

1. Whenever appropriate, the singular form includes the plural form, all references in the past tense also include the present and future tense and vice versa. The term "and" as well as the term "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these requests any information which might otherwise be construed to be outside their scope.

2. If you have knowledge of any document called for by these requests that was but is no longer in your possession or control, identify each such document and state the circumstances under which you lost possession or control of it. You should also immediately take steps to preserve all materials and documents that may be subject to the requests contained herein.

3. These requests are continuing in nature and you are directed to seasonably supplement any prior response to the extent new or additional information subsequently becomes known to you. In such event, you are requested to include in any supplementary response the date and manner in which the new or additional information became known.

4. If you withhold any document or information on the ground that it is privileged or otherwise protected from disclosure, expressly state the exact legal basis for withholding it, state all facts that support your withholding, and provide a description of the nature of the documents, communications or things not produced or disclosed. If a request calls only in part for the disclosure of privileged information, respond to the request to the full extent that such response would not be subject to the objection, provide such information as is not privileged and provide the information requested in the first sentence of this paragraph as to the privileged information.

### DOCUMENTS TO BE PRODUCED

For the period October 26, 2006 to the present, unless otherwise noted, you are requested to produce the following documents:

1. All documents relating to any and all bank accounts, certificates of deposit or trust accounts, in either of the following names: Gerald W. Gorman, Elizabeth A. Gorman, or The Gorman Good Government Group (hereinafter referred

to as the "GGGG") in which they have an interest or in which they have or have had access or control, including, but not limited to, statements, applications, signature cards, checkbook registers, stubs, cancelled checks and passbooks.

2. All documents relating to any and all safe deposit boxes held by Gerald W. Gorman, Elizabeth A. Gorman, or GGGG or for their benefit, including, but not limited to, the location of the box and the location of the key.

3. Any and all documents relating in any way to the GGGG, including but not limited to, its creation, incorporation, charter, by-laws, policies, procedures, state and municipal applications, licenses, financial reports and disclosures.

4. Any and all documents relating to any bank accounts, deposits, disbursements, loans, donations, pledges, or any other document relating to the finances of GGGG.

5. Any and all documents relating in any way to the loan made by Gerald Gorman to the GGGG, including but not limited to, any note, agreement, or other evidence of a loan by Gerald Gorman.

ANSWER

I, \_\_\_\_\_, certify under penalty or perjury that with regard to the  
Citation Respondent  
property of the judgment debtor, the Citation Respondent files the following answer to this Citation to Discover Assets and is  
possession of the following property of the judgment debtor.

Circle one or more of the following and indicate the amount held:

- A) Savings Account (Amount withheld) \$ \_\_\_\_\_
- B) Checking and/or Now Account (Amount withheld) \$ \_\_\_\_\_
- C) Certificate of Deposit (Amount held) \$ \_\_\_\_\_
- D) Money Market Account (Amount held) \$ \_\_\_\_\_
- E) Trust Account (Amount held) \$ \_\_\_\_\_
- F) Safety Deposit Box \$ \_\_\_\_\_
- G) Account(s) No. \_\_\_\_\_
- H) Adverse Claimant: Name \_\_\_\_\_ Address \_\_\_\_\_
- I) Wages, Salary or Commissions \_\_\_\_\_
- J) Other Personal Property (Describe) \_\_\_\_\_

Attach a sheet for any additional information required by the Citation

Sub Total \_\_\_\_\_

Less right of offset for other loans \_\_\_\_\_  
Less deduction for fees limited by  
205 ILCS/48/1 \_\_\_\_\_

Total \_\_\_\_\_

According to the business records kept by the Citation Respondent we show the above accounts to be correct.

\_\_\_\_\_  
Agent for Citation Respondent

\_\_\_\_\_ on oath state.

I am over 21 years of age and not a party to this case. I served the citation to discover assets as follows:

on \_\_\_\_\_, \_\_\_\_\_ by leaving a copy with the third party defendant on  
\_\_\_\_\_ at the hour of \_\_\_\_\_ a.m./p.m. at \_\_\_\_\_  
\_\_\_\_\_ County, Illinois.

On the third party defendant \_\_\_\_\_ by mailing a copy on \_\_\_\_\_,  
by certified mail addressed to agent of the third party defendant, return receipt requested.

(attached green card receipt  
of service here)

\_\_\_\_\_  
\*\* Signed and sworn by party making service  
\_\_\_\_\_

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

CITATION NOTICE

DAIMLERCHRYSLER FINANCIAL SERVICES  
AMERICAS LLC, f/k/a DaimlerChrysler Services  
North America LLC, Plaintiff

v.

GERALD W. GORMAN, an individual, &  
ELIZABETH A. GORMAN, an individual,  
Counterclaim Defendants and Judgment Debtors,

The Gorman Good Government Group, Third Party Respondent

No. 03-CV-00760

Court Date: 01/15, 2009<sup>10</sup>

Time: 9:00 a.m. Judge Kendall

**Judgment Debtor/Debtor's Attorney:**

Name: Elizabeth Gorman, Gerald Gorman  
Firm: N/A  
Address: 10834 Carolyn Ct  
City/State/Zip: Orland Park, IL 60467  
Telephone: 708-349-2280

**Judgment Creditor/Creditor's Attorney:**

Name: Glen T. Keysor, Esq., (#01445032)  
Firm: Thompson Coburn LLP  
Address: 55 East Monroe Street, 37th Floor  
City/State/Zip: Chicago, IL 60603  
Telephone: (312) 580-2210

A Judgment was entered on October 26, 2006 in favor of DaimlerChrysler Financial Services Americas LLC, f/k/a DaimlerChrysler Services North America LLC, and against Ridge Chrysler Plymouth, LLC d/b/a Marquette Chrysler Jeep, Sales, Inc., d/b/a Dodge of Midlothian, Gerald W. Gorman and Elizabeth A. Gorman in the sum of \$4,245,528.30, plus interest and costs, which remains unsatisfied.

Name of person to receive Third Party Citation: The Gorman Good Government Group, 10834 Carolyn Court, Orland Park, Illinois 60467; c/o to Margaret Walsh, Treasurer, 3547 S. Emerald Street, Chicago, Illinois 60609, and Carolyn Doody, Chairwoman, 12543 S. 73rd Ave., Palos Heights, Illinois 60463

Notice: The court has issued a citation against the Third Party Respondent named above for money or property (other than wages) belonging to the judgment debtor or in which the judgment debtor has an interest. The citation directs that person to appear in court to be examined for the purpose of allowing the judgment creditor to discover income and assets belonging to the judgment debtor or in which the judgment debtor has an interest. The citation was issued on the basis of a judgment against the judgment debtor and in favor of the judgment creditor in the amount stated above. On or after the court date stated above, the court may compel the application of any discovered income or assets toward payment on the judgment.

The amount of income or assets that may be applied toward the judgment is limited by federal and Illinois law. **THE JUDGMENT DEBTOR HAS THE RIGHT TO ASSERT STATUTORY EXEMPTIONS AGAINST CERTAIN INCOME OR ASSETS OF THE JUDGMENT DEBTOR WHICH MAY NOT BE USED TO SATISFY THE JUDGMENT IN THE AMOUNT STATED ABOVE. (see below)**

- (1) Under Illinois or federal law, the exemption of personal property owned by the debtor includes the debtor's equity interest, not to exceed \$4,000 in value, in any personal property as chosen by the debtor, including money in a bank account.
- (2) Social Security and SSI benefits;
- (3) Public assistance benefits;
- (4) Unemployment compensation benefits;
- (5) Worker's compensation benefits;
- (6) Veteran's benefits;
- (7) Circuit breaker property tax relief benefits;
- (8) The debtor's equity interest, not to exceed \$2,400 in value, in any one motor vehicle;
- (9) The debtor's equity interest, not to exceed \$1,500 in value, in any implements, professional books, or tools of the trade of the debtor;

- (10) Under Illinois law every person is entitled to an estate in homestead, when it is owned and occupied as a residence, to the extent in value of \$15,000, which homestead is exempt from judgment.
- (11) Under Illinois law, the amount of wages that may be applied toward a judgment is limited to the lesser of (i) 15% of gross weekly wages or (ii) the amount by which disposable earnings for a week exceed the total of 45 times the greater of the state or federal minimum hourly wage.
- (12) Under federal law, the amount of wages that may be applied toward a judgment is limited to the lesser of (i) 25% of disposable earnings for a week or (ii) the amount by which disposable earnings for a week exceed 30 times the federal minimum hourly wage.
- (13) Pension and retirement benefits (including IRA accounts) and refunds may be claimed as exempt under Illinois law.

The judgment debtor may have other possible exemptions under the law.

THE JUDGMENT DEBTOR HAS THE RIGHT AT THE CITATION HEARING TO DECLARE EXEMPT CERTAIN INCOME OR ASSETS OR BOTH. The judgment debtor also has the right to seek a declaration at an earlier date by notifying the clerk in writing at the office of the Clerk of the United States District Court, 20th Floor, 219 South Dearborn Street, Chicago, Illinois. When so notified, the Clerk of the United States District Court will obtain a prompt hearing date from the court and will provide the necessary forms that must be prepared by the judgment debtor or the attorney for the judgment debtor and sent to the judgment creditor or the judgment creditor's attorney by regular first class mail, regarding the time and location of such hearing.

This notice may be sent to the judgment debtor by regular first class mail.

**CERTIFICATION OF MAILING BY JUDGMENT CREDITOR OR ATTORNEY FOR JUDGMENT CREDITOR**

Under penalties as provided by law pursuant to 28 U.S.C. § 1746, the undersigned certifies that s/he mailed by regular first-class mail a copy of the citation notice and this citation to defendant at the address shown below upon filing of the citation or within three business days of service if served upon Third Party Respondent.

Signature: \_\_\_\_\_



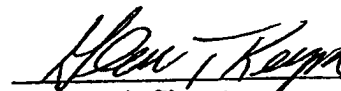
Name: \_\_\_\_\_

Glen T. Keysor

(Please Print)

Preparing Atty's No.: ARDC # 01445032  
 Preparing Atty's Name: Glen T. Keysor, Esq.  
 Firm: Thompson Coburn LLP  
 Address: 55 E. Monroe, 37th Floor  
 City/State/Zip: Chicago, IL 60603  
 Telephone: (312) 346-7500

Preparer's Signature



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