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CLERK OF COOK COUNTY, ILL.

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

RUSSELL J. HARLAN and )  
MALGORZATA-NATASZA CIMOSZEWICZ, )

Plaintiffs, )

v. )

No: 06 L 4317

WPROST, AGENCJA WYDAWNICZO- )  
REKLAMOWA "WPROST" SP. Z O.O., )  
MAREK KROL, FIJOR PUBLISHING, )  
JAN M. FIJOR, MACIEJ RYBINSKI, AND )  
LOWELL INTERNATIONAL CO., )

Defendants. )

3100  
2800  
3372



ANSWER

NOW COMES the Defendant, LOWELL INTERNATIONAL CO., by its attorneys, KRALOVEC & MARQUARD, CHARTERED, and for its Answer to Plaintiffs' Complaint at Law, states as follows:

1. The Defendant neither admits nor denies, but has insufficient knowledge about the allegations in paragraph 1 and demands strict proof thereof.
2. The Defendant neither admits nor denies, but has insufficient knowledge about the allegations in paragraph 2 and demands strict proof thereof.
3. The Defendant neither admits nor denies, but has insufficient knowledge about the allegations in paragraph 3 and demands strict proof thereof.
4. The Defendant neither admits nor denies, but has insufficient knowledge about the allegations in paragraph 4 and demands strict proof thereof.

5. The Defendant neither admits nor denies, but has insufficient knowledge about the allegations in paragraph 5 and demands strict proof thereof.

6. The Defendant neither admits nor denies, but has insufficient knowledge about the allegations in paragraph 6 and demands strict proof thereof.

7. The Defendant neither admits nor denies, but has insufficient knowledge about the allegations in paragraph 7 and demands strict proof thereof.

8. The Defendant neither admits nor denies, but has insufficient knowledge about the allegations in paragraph 8 and demands strict proof thereof.

9. The Defendant neither admits nor denies, but has insufficient knowledge about the allegations in paragraph 9 and demands strict proof thereof.

10. The Defendant denies the allegations in paragraph 10.

11. The Defendant denies that it wrote and published said articles, and neither admits nor denies, but has insufficient knowledge about the remaining allegations in paragraph 11 and demands strict proof thereof.

12. The Defendant neither admits nor denies, but has insufficient knowledge about the allegations in paragraph 12 and demands strict proof thereof.

13. The Defendant neither admits nor denies, but has insufficient knowledge about the allegations in paragraph 13 and demands strict proof thereof.

14. The Defendant neither admits nor denies, but has insufficient knowledge about the allegations in paragraph 14 and demands strict proof thereof.

15. The Defendant denies that it published said article, and neither admits nor denies, but has insufficient knowledge about the remaining allegations in paragraph 15 and demands strict proof thereof.

16. The Defendant neither admits nor denies, but has insufficient knowledge about the allegations in paragraph 16 and demands strict proof thereof.

17. The Defendant neither admits nor denies, but has insufficient knowledge about the allegations in paragraph 17 and demands strict proof thereof.

18. The Defendant neither admits nor denies, but has insufficient knowledge about the allegations in paragraph 18 and demands strict proof thereof.

19. The Defendant neither admits nor denies, but has insufficient knowledge about the allegations in paragraph 19 and demands strict proof thereof.

20. The Defendant neither admits nor denies, but has insufficient knowledge about the allegations in paragraph 20 and demands strict proof thereof.

21. The Defendant admits that it did not conduct any investigation to confirm the allegations and facts set out in the article, and neither admits nor denies, but has insufficient knowledge about the remaining allegations in paragraph 21 and demands strict proof thereof.

22. The Defendant denies that it published said article, and neither admits nor denies, but has insufficient knowledge about the remaining allegations in paragraph 21 and demands strict proof thereof.

23. The Defendant neither admits nor denies, but has insufficient knowledge about the allegations in paragraph 23 and demands strict proof thereof.

24. The Defendant neither admits nor denies, but has insufficient knowledge about the allegations in paragraph 24 and demands strict proof thereof.

25. The Defendant neither admits nor denies, but has insufficient knowledge about the allegations in paragraph 25 and demands strict proof thereof.

26. The Defendant denies that it wrote and published said article, and neither admits nor denies, but has insufficient knowledge about the remaining allegations in paragraph 26 and demands strict proof thereof.

27. The Defendant denies each and every allegation contained in paragraph 27.

28. The Defendant neither admits nor denies, but has insufficient knowledge about the allegations in paragraph 28 and demands strict proof thereof.

29. The Defendant neither admits nor denies, but has insufficient knowledge about the allegations in paragraph 29 and demands strict proof thereof.

30. The Defendant denies each and every allegation contained in paragraph 30.

31. The Defendant denies that it wrote and published said articles, and neither admits nor denies, but has insufficient knowledge about the remaining allegations in paragraph 31 and demands strict proof thereof.

32. The Defendant denies that it made any scandalous accusations and neither admits nor denies, but has insufficient knowledge about the remaining allegations in paragraph 32 and demands strict proof thereof.

33. This Defendant denies each and every allegation contained in paragraph 33.

**COUNT I**

- 34. The Defendant repeats and reallages its previous answers as if fully set forth herein.
- 35. The Defendant denies each and every allegation contained in paragraph 35.
- 36. The Defendant denies each and every allegation contained in paragraph 36.
- 37. The Defendant denies each and every allegation contained in paragraph 37.
- 38. The Defendant denies each and every allegation contained in paragraph 38.

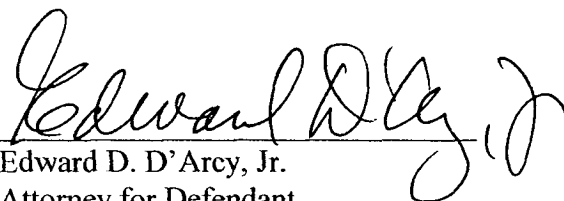
WHEREFORE, the Defendant, LOWELL INTERNATIONAL CO., respectfully prays for judgment in its favor and against the Plaintiffs, as to Count I, together with costs and attorney's fees.

**COUNT II**

- 39. The Defendant repeats and realleges its previous answers as if fully set forth herein.
- 40. The Defendant denies each and every allegation in paragraph 40.
- 41. The Defendant denies each and every allegation in paragraph 41.
- 42. The Defendant denies each and every allegation in paragraph 42.

WHEREFORE, the Defendant, LOWELL INTERNATIONAL CO., respectfully prays for judgment in its favor as to Count II, together with costs and attorney's fees.

KRALOVEC & MARQUARD, CHTD.

By:   
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