

November 3, 2014

**ATTORNEY CLIENT PRIVILEGE -
NOT TO BE DISCLOSED**

Mr. Giells Kouassi
Ms. Marie-Claire Koissi-Kouassi
3266 White Oak Lane
Eau Claire, WI 54703

Re: Jackson v. Kouassi
Court No.: 14 CH 19 (McDonough)
Our File No.: 21240-80-98-OB

Dear Mr. Kouassi and Mrs. Koissi-Kouassi:

IMT Insurance Company retained this law firm to defend you in the above-captioned matter which arises out of a fence dispute which occurred in August 2011, at or near your home located at 137 James Drive, Macomb, Illinois. We held off originally reaching out to both of you since we were waiting for the reservation of rights letter that was sent out by the company. Our defense is under a reservation of rights. We are in touch with your personal counsel in the mean time.

Please note that while IMT is reserving its rights as to indemnity, it is honoring an obligation to defend under the policy of insurance. To that end, it retained our firm to defend you both and control that defense. Please note that we are being paid exclusively by IMT. IMT is coming forward to pay all defense fees, costs, expenses and disbursements.

We do know you retained your own counsel, Mr. James E. Skinner. Mr. Skinner is aware of our role. We will need to clarify with you both and Mr. Skinner your direction to IMT that you do not wish coverage, including defense as to this matter as stated in your October 28, 2014 letter.

If your position, is to withdraw the tender and enter into an agreement with IMT that you are not looking now or ever for defense or indemnity, that is one thing. If your position, on the other hand, is that you simply do not want our involvement as your counsel and you wish to see how things develop, that is something we need to discuss with you and Mr. Skinner. Since arguably you may want coverage, including defense, as to this claim, you need to decide one way or the other whether to include IMT or not. We are not counsel for IMT. We are retained for you both. We are only paid by IMT for your defense. We have no reason not to work in tandem with Mr. Skinner. If, for example, you wish to continue to pay Mr. Skinner and he wishes to take the laboring oar for now on

STELLATO & SCHWARTZ, LTD.

TELEPHONE (847) 330-3700 • FACSIMILE (847) 330-3711 • LAWFIRM@STELLATOSCHWARTZ.COM
CHICAGO OFFICE • 120 NORTH LASALLE STREET, 34TH FLOOR, CHICAGO, ILLINOIS 60602 • (312) 419-1011

Mr. Giells Kouassi
Monday, November 03, 2014
Our File No.: 21240-80-98-OB
Page Two

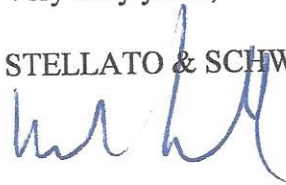
this motion practice, we can work this out. I am sure he and I can coordinate both written and oral argument. However, you need to appreciate that our services do come at IMT's expense, and it may be better to let us carry the laboring oar, so you out-of-pocket payments to counsel, Mr. Skinner may be lesser than what they might otherwise be.

Please do call me so we can discuss this further. Mr. Skinner is expressly copied below and we look forward to his clarification as to your position on whether you wish your tender to IMT to remain in effect or not.

Additionally, I enclose a Personal Client Data Sheet for you to complete. Please return it in the envelope provided. I look forward to speaking with you soon.

Very truly yours,

STELLATO & SCHWARTZ, LTD.



By: Mark A. Huske
mhuske@stellatoschwartz.com

MAH:nws
Enclosure

cc: **VIA E-MAIL: jim.rehnskinner@grics.net**
Mr. James E. Skinner
Rehn & Skinner
5 East Simmons Street
Galesburg, Illinois 61401

cc: **VIA E-MAIL: jim.todd@theimtgroup.com**
Mr. Jim Todd, AIC
Senior Claims Manager
The IMT Group
4445 Corporate Drive
West Des Moines, IA 50266
Your Insured: Gilles Kouassi
Your Claim No.: 2014G7619

Monday December 8, 2014
Gilles K. Kouassi
C/O Marie Claire Koissi-Kouassi
3266 White Oak Ln
Eau-Claire, WI 54703

To Kim D. Wilson
Clerk of the Circuit Court of the
Ninth Judicial Circuit
McDonough County, Illinois

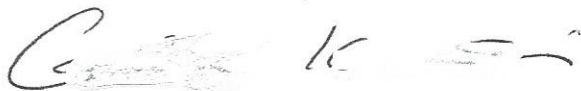
Dear Mr. Wilson,

On September 4, 2014, we, my spouse Marie-Claire Koissi-Kouassi and I, Gilles K. Kouassi received a summons to file a response in case (14-CH-19) of allegations of Mr. and Mrs. Jackson against us, or otherwise file our appearance to the office of the Clerk of this court at the McDonough County Courthouse.

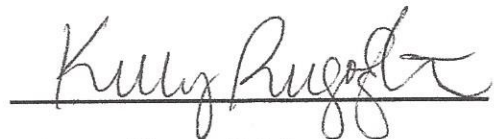
On October 7, 2014, a response was filed through the attorney we hired for our representation. According to the attorney, the court decision was sheduled for November 25, 2014. Up to this day December 8, 2014, I have not received any information regarding the decision.

I am hereby coming to request the court decision on the motion to dismiss filed by my attorney. Also, I am kindly requesting that any court documents on this case and relevant to us, the defendants be sent to us.


Sincerely,

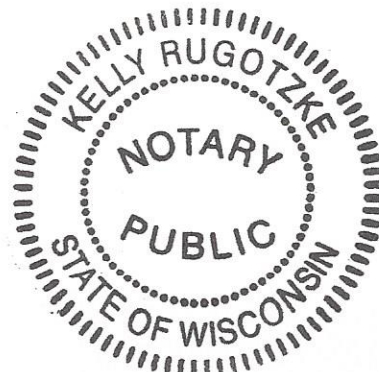


Gilles K. Kouassi, PhD
Associate Professor of Chemistry



Notary Public


Name Kelly Rugotzke Loc #00756
Notary Exp 4.14.18 MAC NB054011
Wells Fargo Bank, N.A. COID 727
Eau Claire Westgate Office AU 0003848
NMLSR ID _____



October 27, 2014

Gilles K. Kouassi
C/O Marie-Claire Koissi-Kouassi
3266 White Oak Ln
Eau Claire WI 54703

Mr. James E. Skinner
Rehn & Skinner
5 East Simmons Street
Galesburg, Illinois 61401

Dear Mr. Skinner,

In a letter sent to my wife's address and apparently copied to you, the law firm STELLATO & SCHWARTZ stated that it has been retained by IMT Insurance to defend my wife and me.


The purpose of the present letter is to reiterate that you remain the Attorney of Gilles K. Kouassi and Marie-Claire Koissi-Kouassi in the case No 14CH 19, Jackson v. Kouassi. We have not agreed with any law firm other than yours to defend us.

I contacted the representative of IMT Insurance (with whom we have a homeowner insurance) in Eau Claire Early September 2014 to inform about the conspiracy under way in Macomb at the origin of this strange lawsuit aimed at preventing us from selling our house. Since we signed the representation agreement with you, we have not been in any discussion with IMT Insurance regarding this case (No 14CH 19).

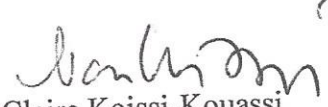
Please note that STELLATO & SCHWARTZ is not acting on our behalf. You remain the Attorney that we chose to defend us in this case.

Sincerely,

Your clients:


Gilles K. Kouassi

&


Marie Claire Koissi-Kouassi

Oct 27, 2014

REHN & SKINNER, L.L.C.
Attorneys at Law
5 East Simmons Street
Galesburg, IL 61401

John Rehn
James E. Skinner
www.rehnandskinner.com

Telephone: (309) 343-3600
Toll Free: (800) 440-3814
Fax: (309) 343-9966

October 29, 2014

Gilles Kouassi
3266 White Oak Lane
Eau Claire, WI 54703

RE: Roger & Janet Jackson

Dear Mr. Kouassi:

As you probably know, your insurance company has accepted defense in this matter. I would like to discuss this with you, over the phone. The phone number that I have, (715) 721-4766 is not currently working. If you would please contact me, I would appreciate it.

Sincerely,



JAMES E. SKINNER

JES:pat

REHN & SKINNER, L.L.C.
Attorneys at Law
5 East Simmons Street
Galesburg, IL 61401
rehnskinner@grics.net

John Rehn
James E. Skinner
www.rehnandskinner.com

Telephone: (309) 343-3600
Toll Free: (800) 440-3814
Fax: (309) 343-9966

December 12, 2014

Via e-mail & U.S. Mail
koissimc@gmail.com; bingertal35@gmail.com

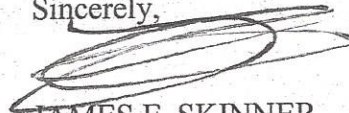
Gilles Kouassi
3266 White Oak Lane
Eau Claire, WI 54703

RE: Roger & Janet Jackson

Dear Mr. Kouassi:

I spoke with Mr. DeJoode, the attorney for the Jacksons on the 11th of December. He indicated that his clients have decided after he discussed with them the possibility that we would counter-claim against them, to dismiss their lawsuit. This will end the litigation against you in McDonough County, Illinois. I would suggest that you take no further action in this matter and just put this chapter behind you. I understand it was very difficult time for you, dealing with these people, however you now are living in Wisconsin and moved on and I think that any attempts to sue them would merely bring up old wounds, in addition to the fact that there probably are statute of limitations problems regarding the injury to your wife. Should you have any questions or comments, feel free to contact me.

Sincerely,



JAMES E. SKINNER

JES:pat

December 16, 2014

Gilles K. Kouassi
3266 White Oak Ln
Eau-Claire, WI 54703

To James Skinner
Attorney at Rehn and Skinner, LLC
5 East Simmons Street
Galesburg, IL 61401

Mr. Skinner,

During our phone conversation in October, you told me that after you filed the motion to dismiss case 14-CH-19, you were scheduled to appear in court on November 25 to hear the judge decision on that motion. When I called you to know the court decision a week ago, you also told me that the judge has decided to dismiss the case and has given 30 days ~~month~~ to the plaintiff to file a new complaint "following Illinois rules". I then requested a copy of the court decision and you promised to send it the same day.

Today December 16, I received your letter dated December 12, which contains no copy of the court decision you promised to send me. Instead of a copy of the court decision, you reported a supposed discussion you have had with the plaintiffs' attorney. So far, I have not made a demand for any discussion with the "plaintiffs". The only legal action I was aware of is the motion to dismiss which was directed to the McDonough County Court. My spouse and I have never demanded the mercy of the "plaintiffs". We are simply requesting a hard copy of the official court decision you said you received on November 25, 2014, because the e-mail attachment you claimed is the court decision is inaccessible.

As for you advice regarding attorneys from Chicago area selected by the insurance company for us, I have been very clear from the beginning that we do not need the service of any pseudo attorney hired by any insurance company to defend us. At least, we should have the right to choose the attorney we deem suitable to represent us and the appropriate time for a legal response to this masquerade.

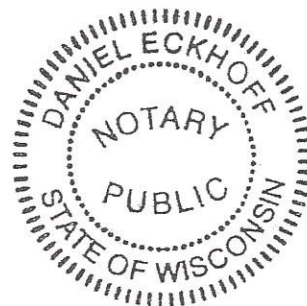
A legal firm outside Illinois has proposed to handle the countersuing and any other complaint without requesting any contingency fee.

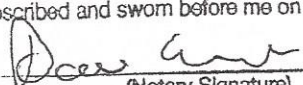
We are not asking you to represent us any further in the pursuit of this matter. The sole document we are awaiting from you is the court decision you previously acknowledged that you received on November 25, 2014.

Sincerely,



Gilles K. Kouassi, Ph.D.
Associate Professor of Physical Chemistry



State of Wisconsin County of Eau Claire
Subscribed and sworn before me on 12-19-14
(Date)

(Notary Signature)

December 22, 2014

 **COPY**

Gilles and Marie-Claire Kouassi
3266 White Oak Ln.
Eau Claire, WI, 54703

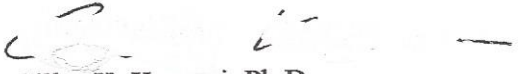
Mark A Huske
Stellato & Schwartz
425 North Martingale Road
Suite 1150
Shaumburg, Illinois 60173

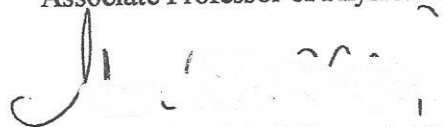
Mr. Huske,

A letter signed by you, Mark A. Huske, addressed to Giells Kouassi [who is a person different from me] and Marie-Claire Koissi-Kouassi was found in our mail box. In this letter you referred to Case 14CH 19. Because you referred to this case and you have the name of my wife in your letter, I would like to tell you the following:

1. We, Marie-Claire Koissi-Kouassi, and Gilles K. Kouassi do not know you and have never requested any service from you or your law office.
2. We have never signed any agreement that authorizes you to act on our behalf. You are well aware that signing on behalf of individuals without their consent in any legal procedure is illegal.
3. We wrote several times to the insurance company IMT and their representatives in Macomb to let them know that we do not want any action taken by any law office of their choice on our behalf. We also asked IMT and their representative to inform you that you should refrain from taking any action on our behalf.
4. Once again we ask you to stop sending us mail because we have nothing to do with you.
5. Any further intrusion in our life will be considered as a harassment

Sincerely,


Gilles K. Kouassi, Ph.D.
Associate Professor of Physical Chemistry


Marie-Claire Koissi-Kouassi, PhD.
Associate Professor of Mathematics

cc: James E. Skinner
Rehn & Skinner
5 East Simmons Street
Galesburg, Illinois 61401

State of Wisconsin County of Eau Claire
Subscribed and sworn before me on 12/23/2014 (Date)

Kenalee Childs
(Notary Signature)

Kenalee Childs

My commission expires: 01/26/18



Monday, December 22, 2014

 COPY

Gilles K. Kouassi
& Marie Claire Koissi-Kouassi
3266 White Oak Ln
Eau-Claire, WI 54703

To the Honorable James B. Stewart, Chief Judge
Circuit Court of the Ninth Judicial Circuit
McDonough County, Illinois
130 S. Lafayette Street, Suite 30
Macomb, IL 61455

Honorable,

On September 4, 2014, we [my spouse Marie-Claire Koissi-Kouassi and I, Gilles K. Kouassi] received from the Clerk of the McDonough County Courthouse a summons to file a response to allegations of Mr. and Mrs. Jackson against us. Early October 2014, Mr. James Skinner, the attorney we hired to respond to this summons filed a motion to dismiss case # 14-CH-19.

According to Mr. Skinner, the judge's decision on the motion to dismiss was scheduled for November 25, 2014. Mr. Skinner confirmed early December 2014 that the Judge has dismissed the case in response to the motion to dismiss he filed on our behalf on October 4, 2014.

While we were expecting a copy of the dismissal order of November 25 that Mr. Skinner promised to send us, we received, instead, a letter from Mr. Skinner containing an "Order Granting Motion for Voluntary Dismissal" from the plaintiffs filed on December 16 [Please see exhibit 1]. This order bared the signature of the judge. However, the name of the judge does not appear on the document. It is unusual to see a judge signing a document without having his name accompanying his signature.

Honorable Judge Stewart, we are writing to inquire if the enclosed motion is yours. The present letter is aimed at verifying the authenticity of this motion.

We thank you for your time.

Sincerely,



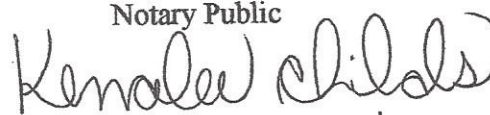
Gilles K. Kouassi, PhD
Associate Professor of Chemistry

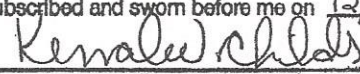


Marie-Claire Koissi-Kouassi, PhD.
Associate Professor of Mathematics



Notary Public


Kenalee Childs

State of Wisconsin County of Eau Claire
Subscribed and sworn before me on 12/23/2014

(Notary Signature)

My commission expires 01/26/2018

 **COPY**

December 23, 2014

Gilles K. Kouassi
3266 White Oak Lane
Eau Claire, Wisconsin 54703

Debra Bainter
Deputy Circuit Clerk
1 Courthouse Square
Macomb, IL 61455

Dear Mrs. Bainter,


I am in receipt of your letter dated December 15 regarding the court documents I requested from the Clerk.

You indicated that you found we have had two attorneys entering their appearance for us. I am not aware of such thing.

I signed a representation agreement with Mr. James Skinner from Rehn & Skinner Law Office in Galesburg in September 2014. Mr. James Skinner was the only attorney we hired for this "case # 14-CH-19". We have not authorized any other law firm or person to take any legal action on our behalf.

Mr. Skinner's mission has ended.

Sincerely,


Gilles K. Kouassi Ph.D.
Associate Professor of Physical Chemistry

State of Wisconsin County of Eau Claire
Subscribed and sworn before me on 12/23/2014
Kenalee Childs (Date)
(Notary Signature)

Kenalee Childs
My commission expires: 01/26/18

cc: To Kim D. Wilson
Clerk of the Circuit Court of the
Ninth Judicial Circuit
McDonough County, Illinois



IN THE CIRCUIT COURT OF THE NINTH JUDICIAL CIRCUIT
McDONOUGH COUNTY, ILLINOIS

ROGER L. JACKSON and,
JANET M. JACKSON,
Plaintiff,

vs.

GILLES KOUASSI and,
MARIE-CLAIRE KOISSI-KOUASSI,
Defendant.

14-CH-19

FILED

DEC 15 2014

KIM D. WILSON
CIRCUIT CLERK

MOTION FOR VOLUNTARY DISMISSAL

Plaintiffs, Roger L. Jackson and Janet M. Jackson, by and through their attorneys, March, McMillan, DeJoode & Duvall, P.C., respectfully request the Court for leave to voluntarily dismiss their complaint, pursuant to 735 ILCS 5/2 - 1009 (2014) and as said motion, Plaintiffs state that:

1. The Plaintiffs filed the above-captioned matter on or about August 22, 2014.
2. Defendants have been served with a summons and attorney James Skinner has entered his appearance on behalf of the Defendants.
3. This motion is being made at a time before trial or hearing begins and Plaintiffs have tendered the costs paid by the Defendant to their counsel.
4. The attorney for the Defendants has no objection to this motion.

WHEREFORE, Plaintiffs respectfully request the Court to grant voluntary dismissal, without prejudice, with leave to reinstate, and for all other relief the court deems just and equitable.

Date: 12/15, 2014

Roger L. Jackson and Janet M. Jackson,

By: 

Jeff W. DeJoode, Attorney for Plaintiffs

Jeff W. DeJoode
March, McMillan, DeJoode & Duvall, P.C.
402 E. Jackson St.
Macomb, IL 61455

Telephone: (309) 837-2904

jeff@mmdlaw.com

IN THE CIRCUIT COURT OF THE NINTH JUDICIAL CIRCUIT
McDONOUGH COUNTY, ILLINOIS

ROGER L. JACKSON and,
JANET M. JACKSON,
Plaintiff,

vs.

GILLES KOUASSI and,
MARIE-CLAIRE KOISSI-KOUASSI,
Defendant.

14-CH-19

FILED

DEC 16 2014

KIM D. WILSON
CIRCUIT CLERK

ORDER GRANTING MOTION FOR VOLUNTARY DISMISSAL

This matter coming before the Court upon Plaintiffs, Roger L. Jackson and Janet M. Jackson; motion for leave to voluntarily dismiss their complaint, pursuant to 735 ILCS 5/2 - 1009 (2014) as said motion, and the Court being fulling informed in the premises finds that:

1. The Plaintiffs filed the above-captioned matter on or about August 22, 2014.
2. Defendants have been served with a summons and attorney James Skinner has entered his appearance on behalf of the Defendants.
3. Plaintiffs motion is being made at a time before trial or hearing begins and Plaintiffs have tendered the costs paid by the Defendant to their counsel.
4. Counsel for the Defendants has no objection to Plaintiffs' motion.

IT IS WHEREFORE ORDERED that Plaintiffs' complaint is voluntary dismissed, without prejudice, and leave is granted to reinstate, as provided by law.

Date: Dec 16, 2014

Entered:


JUDGE

Jeff W. DeJoode
March, McMillan, DeJoode & Duvall, P.C.
402 E. Jackson St.
Macomb, IL 61455
Telephone: (309) 837-2904

jeff@mmdlaw.com

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JWD