Hearing Date: 7/1/2026 10:00 AM - 10:05 AM
Location: <<CourtRoomNumber>>
Judge: Calendar, Y

FILED
6/22/2026 2:36 AM
Mariyana T. Spyropoulos
CIRCUIT CLERK
COOK COUNTY, IL
2022L010246
Calendar, Y
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FILED DATE: 6/22/2026 2:36 AM 2022L010246

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

30 DEGREE DESIGN, LLC, an Illinois Limited Liability Company, BRAD BEHMER, an individual, and KENNETH MAYLE, an individual,	)	
Plaintiffs,	)	No. 2022 L 010246
v.	)	Calendar Y, Courtroom 2004
GP OPPORTUNITY FUND, LLC, an Illinois Limited Liability Company,	)	Hon. John J. Tully, Jr.
Defendant.	)	

PLAINTIFF KENNETH MAYLE'S MOTION FOR LEAVE TO FILE MOTION TO CLARIFY AND ENFORCE THE MAY 18, 2026 ORDER, PARAGRAPH 8, AS TO INTERROGATORY VERIFICATION, TO STRIKE OR SUPERSEDE PARAGRAPH 2 OF THE JUNE 12, 2026 ORDER AS INCONSISTENT THEREWITH, AND TO STRIKE GP'S JULY 2024 INTERROGATORY RESPONSES FOR FAILURE TO COMPLY WITH COURT ORDERS AND ILLINOIS SUPREME COURT RULES 213(d) AND 213(i)

NOW COMES Plaintiff Kenneth Mayle, pro se, and respectfully moves this Court pursuant to the June 12, 2026 Order, Paragraph 6, for leave to file the attached Motion to Clarify and Enforce the May 18, 2026 Order, ¶8, as to Interrogatory Verification, to Strike or Supersede Paragraph 2 of the June 12, 2026 Order as Inconsistent Therewith, and to Strike GP's July 2024 Interrogatory Responses for Failure to Comply with Court Orders and Illinois Supreme Court Rules 213(d) and 213(i) ("Clarification and Strike Motion"), and in support thereof states:

BACKGROUND

1. On June 12, 2026, this Court entered an Order requiring that Mr. Mayle "not file any more motions in advance of the August 19, 2026 pretrial conference without prior leave of court." June 12, 2026 Order, ¶6.

2. The Clarification and Strike Motion is not a new substantive claim or a recycled motion on a previously adjudicated issue. It addresses a narrow, discrete procedural deficiency: the failure of Paragraph 2 of the June 12, 2026 Order—drafted by defense counsel and submitted to the Court—to encompass GP's July 2024 Interrogatory Answers within the verification obligation already imposed by the Court's May 18, 2026 Order, ¶8, and GP's

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ongoing refusal to comply with that obligation for nearly two years since those answers were first served.

3. GP's own conduct following the June 12, 2026 Order has made this Motion necessary. On June 11, 2026, seventeen days after the May 25, 2026 Court-ordered deadline, defense counsel submitted a verification page bearing the date May 15, 2023. That 2023 document plainly covers GP's Answer and Affirmative Defenses—not the July 2024 Interrogatory Answers—and does not satisfy the May 18, 2026 directive.

4. Unless leave is granted and the Court confirms that the May 18, 2026 Order already encompasses interrogatory verification, GP will argue that Paragraph 2 of the June 12, 2026 Order—narrower in scope than the May 18 directive it was meant to implement—forecloses any further enforcement of the interrogatory verification obligation before trial. The prejudice to Mr. Mayle would be irreparable.

5. Although the signature is familar, it does not appear to be Bryon Finke's. GP's July 2024 Interrogatory Answers additionally contain a 1-109 certification on page 9 bearing a signature with no printed name, no date, and no identification of the certifying party. As a result, Mr. Mayle and this Court cannot determine whether the answers were sworn by any person with authority or personal knowledge. This deficiency is independent of, and in addition to, the verification failure.

THE MOTION IS PROPER AND NON-FRIVOLOUS

6. The Clarification and Strike Motion is based entirely on the text of this Court's own orders and on black-letter Illinois procedural authority. All authority cited therein is real, verified, and on point:

   (a) Illinois Supreme Court Rule 213(a) defines interrogatory answers as discovery responses.

   (b) Illinois Supreme Court Rule 213(d) requires that interrogatory answers be sworn.

   (c) Illinois Supreme Court Rule 213(i) imposes a self-executing duty to supplement discovery responses.

   (d) 735 ILCS 5/1-109 requires that any certification identify the certifying party by name and establish personal knowledge.

   (e) Illinois Supreme Court Rule 219(c) authorizes this Court to strike discovery responses and impose evidentiary sanctions, including witness preclusion, where a party unreasonably fails to comply with discovery obligations or court orders.

7. The relief sought is both confirmatory and corrective: it asks the Court to confirm what the May 18, 2026 Order already says, to correct an Order drafted by the opposing party that is narrower than the underlying directive, to require GP to comply with an obligation it has disregarded weeks past the court-ordered May 25, 2026 deadline, and—if GP continues in noncompliance—to strike its deficient July 2024 Interrogatory Answers

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and preclude GP from introducing at trial testimony or evidence on matters it failed to properly disclose therein including witnesses.

8. Leave of court to file is appropriate where, as here, the proposed motion: (a) addresses a concrete, ongoing discovery compliance issue; (b) is grounded in verified, existing orders and authenticated statutory authority; (c) presents no new legal theories that were available and rejected at prior hearings; and (d) is necessary to preserve an enforceable record before the September 14, 2026 bench trial.

NO UNDUE BURDEN ON THE COURT OR THE PARTIES

9. The Clarification and Strike Motion is five pages. It presents two factual issues: (1) whether the May 18, 2026 Order required verification of the July 2024 Interrogatory Answers, and (2) whether the 2023 verification page submitted by defense counsel satisfies that requirement as to those 2024 answers. Both questions can be resolved on the face of the existing record without additional briefing by the opposing party if the Court so chooses.

10. The Motion was filed on June 18, 2026, within the additional time granted to Mr. Mayle by the June 12, 2026 Order, ¶5, to file his motion to amend his answer and affirmative defenses to counterclaim. To the extent the Court treats that paragraph as having authorized this Motion, this leave motion is submitted in the alternative and without waiving that argument.

RELIEF REQUESTED

WHEREFORE, Plaintiff Kenneth Mayle respectfully requests that this Court enter an Order:

1. Clarifying that Paragraph 2 of the June 12, 2026 Order was and is intended to encompass verification of GP Opportunity Fund, LLC's July 2024 Interrogatory Answers as part of the May 18, 2026 Order's requirement that GP "provide verification of its discovery responses," and that Paragraph 2 does not limit the verification obligation to GP's Answer and Affirmative Defenses;

2. Striking or, in the alternative, superseding Paragraph 2 of the June 12, 2026 Order with corrected language expressly requiring GP Opportunity Fund, LLC to file a sworn verification of its July 2024 Interrogatory Answers, identifying by full name the individual who executed the 1-109 certification on page 9 of those Answers, that person's relationship to GP Opportunity Fund, LLC, and the specific basis for that person's personal knowledge;

3. Striking GP Opportunity Fund, LLC's July 2024 Interrogatory Answers for failure to comply with the May 18, 2026 Order and Illinois Supreme Court Rules 213(d) and 213(i), and precluding GP from introducing at trial testimony or evidence on matters it failed to properly disclose in those Answers; and

4. Granting such other and further relief as this Court deems just and proper.

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Respectfully submitted,

/s/ Kenneth Mayle
Kenneth Mayle, Pro Se
1034 N. Karlov Ave
Chicago, IL 60651
Tel.: (248) 635-7455
ken.mayle@gmail.com
Pro Se No. 995006

Dated: 6-22-2026

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CERTIFICATE OF SERVICE

Under penalties as provided by law pursuant to Section 1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that on Sees tamp, a true and correct copy of the foregoing Motion for Leave was served via email upon:

Zachary D. Limbaugh
The Limbaugh Law Firm
417 West Superior Street
Chicago, Illinois 60654
Limbaugh@LimbaughLawFirm.com
Attorney ID # 49252 / ARDC # 6306446

/s/ Kenneth Mayle
Kenneth Mayle, Pro Se
Pro Se No. 995006
6-22-2026

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EXHIBIT LIST

Exhibit	Description
A	Email from Zachary D. Limbaugh to Kenneth Mayle, June 11, 2026, attaching 2023 Verification page dated May 15, 2023, missing interrogatory verification
B	GP Opportunity Fund, LLC Responses and Objections to Plaintiffs' First Set of Interrogatories, dated July 11, 2024 (complete, pages 1–10) — attention directed to page 9: 1-109 certification bearing unattributed signature with no printed name, no date, and no identification of certifying party; compare signature on page 9 with known Bryon Finke signature on Exhibit A and signatures similar to defense counsel on pages 8 and 10 of the same document

C - Email to Defense councel per 201k requesting meet and confir and meet 213x requirements including verification of interrogatory responses / updates

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Gmail **Kenneth Mayle <ken.mayle@gmail.com>**

Verification

Zachary Limbaugh <Limbaugh@limbaughlawfirm.com> Thu, Jun 11, 2026 at 8:18 AM
To: Kenneth Mayle <ken.mayle@gmail.com>

Ken

Here is the verification page from the original answer and affirmative defenses. The other one is attached to our discovery responses and should be the last page. Please let me know if that is missing or what else you are looking for. Sorry if you didn't have this I thought I sent this already.

Zachary D. Limbaugh
Attorney at Law

The Limbaugh Law Firm
417 West Superior Street
Chicago, Illinois 60654

T: (312)612-9225

www.LimbaughLawFirm.com

***Note: This message, or attachments thereto may contain legally privileged and/or confidential information protected by the attorney-client privilege. It is intended only for the addressed recipient(s). If you have received this message in error, (1) do not read it, (2) do not open or save any attachments, (3) reply to the sender that you received it in error, and (3) erase or permanently destroy the message. Legal advice contained in the preceding message is solely for the benefit of the client(s) of The Limbaugh Law Firm represented by the Firm in the particular matter addressed in the message and may not be relied upon by any other party.

VERIFICATION BY CERTIFICATION - Bryon Finke.pdf
377K

Exhibit A
1/1

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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
LAW DIVISION

30 DEGREE DESIGN, LLC, an Illinois limited liability company, BRAD BEHMER, an individual, and KENNETH MAYLE, an individual Plaintiffs, v. GP OPPORTUNITY FUND, LLC, an Illinois Limited Liability Company. Defendant.	)	No. 22 L 10246 Calendar I Room 1906

GP OPPORTUNITY FUND, LLC's RESPONSES AND OBJECTIONS TO PLAINTIFFS' FIRST SET OF INTERROGATORIES

GENERAL OBJECTIONS

1. Each of Defendants's answers, in addition to any specifically stated objections, is subject to and incorporates the following general responses and objections. The assertion of the same, similar, or additional objections, or a partial response to any individual request does not waive any of the general responses and objections.

2. The following answers reflect the current state of Defendant's knowledge, understanding and belief respecting matters about which inquiry has been made. Defendant expressly reserves its right to supplement or modify these answers with such pertinent information as it may hereafter discover or as may be informed by the opinions of experts retained by the parties to testify in the trial of this matter, and will do so to the extent required by the Illinois Code of Civil Procedure. Defendant reserves the right to rely on, at any time, including trial, subsequently discovered documents and/or information.

3. Defendant objects to these interrogatories to the extent that they are overbroad, unduly burdensome, vague, ambiguous, confusing, require speculation to determine their meaning or use imprecise specifications of the information sought.

4. Defendant objects to any interrogatory to the extent that it seeks information neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

5. Defendant objects to any interrogatory as unduly burdensome to the extent that it seeks information that is a matter public record, already in Plaintiffs' possession, or otherwise readily

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available to to Plaintiffs, and, therefore, may be accessed and obtained byPlaintiffs with less burden than Defendants.

6. Defendant objects to the interrogatories to the extent that they call for information protected by the attorney-client privilege, the work product doctrine, and/or any other applicable privilege or protection.

7. Defendant's decision to respond notwithstanding the objectionable nature of any of the interrogatories should not be construed as a waiver of any of these general objections or a waiver of these general objections as a whole.

8. Defendant objects to interrogatories to the extent they contain more interrogatories, including subparts, than permissible under Illinois Supreme Court Rule 213(c).

ANSWERS TO INTERROGATORIES

1. State the full name of the defendant answering, as well as your current residence address, date of birth, marital status, driver's license number and issuing state, and the last four digits of your social security number, and if different give the full name, as well as the current residence address, date of birth, marital status, driver's license number and issuing state, and the last four digits of the social security number of the individual signing these answers.

ANSWER: Defendant Answering is GP Opportunity Fund, LLC an Illinois limited liability

2. State the full name and current residence address of each person who witnessed or claims to have witnessed the occurrence that is the subject of this suit.

ANSWER: Defendant objects on the grounds that it is unclear what "occurrence" Plaintiffs refer to in this interrogatory and requires Defendant to speculate as Plaintiffs complaint raises a number of allegations occurring over a period of several years. Without waiving said objection Defendant states that the following individuals are believed to have witnessed some or all of the events giving rise to this suit:

Brad Behmer
Unknown residence

Kenneth Mayle

Bryon Finke

Unknown members of the City of Chicago Department of Buildings Task Force present on 6/17/22 raid

City of Chicago Fire Marshall Rowland

Exhibit B 2/10

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3. State the full name and current residence address of each person not named in interrogatory No. 2 above who was present and/or claims to have been present at the scene immediately before, at the time of, and/or immediately after the occurrence.

Answer: Defendant objects to interrogatory Number 3 on the grounds that it is unclear what "occurrence" Plaintiff's interrogatory refers to as Plaintiffs have raised multiple allegations against Defendant involving separate occurrences over multiple years.

4. As a result of the occurrence, were you made a defendant in any criminal or civil action? If so, state the court, the caption, the case number, the charge or charges filed against you, whether you pleaded guilty thereto and the final disposition.

Answer: Defendant objects to interrogatory Number 4 on the grounds that it is unclear what "occurrence" Plaintiff's interrogatory refers to as Plaintiffs have raised multiple allegations against Defendant involving separate occurrences over multiple years. Without waiving said objection, Defendant answers that it was made a party to a City of Chicago Municipal Code Enforcement Action, in the Circuit Court of Cook County under case number 22M1401400, the case is pending dismissal with full compliance.

5. Were you the owner of the property involved in the occurrence, both individually or corporate? If so, state whether the property was repaired and, if so, state when, where, by whom, and the cost of the repairs.

Answer: Defendant objects to interrogatory Number 5 on the grounds that it is unclear what "occurrence" Plaintiff's interrogatory refers to as Plaintiffs have raised multiple allegations against Defendant involving separate occurrences over multiple years. Answering further and without waiving said objection, Defendant is the owner of the property at leased to and subsequently dest

6. State whether you, individually or corporately were named or covered under any policy, or policies, of liability insurance effective on the date of the occurrence and, if so, state the name of each such company or companies, the policy number or numbers, the effective period(s) and the maximum liability limits for each person and each occurrence, including umbrella or excess insurance coverage, property damage and medical payment coverage.

Answer: Defendant objects to interrogatory Number 6 on the grounds that it is unclear what "occurrence" Plaintiff's interrogatory refers to as Plaintiffs have raised multiple allegations against Defendant involving separate occurrences over multiple years. Answering further and without waiving said objection, Defendant states that the only policy related to the property in this suit naming or covering Defendant was the policy Plaintiffs' purported to secure from Acord

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under policy number 2J6LK9.

7. Do you have any information:
   (a) That any plaintiff was, within the five years immediately prior to the occurrence, confined in a hospital and/or clinic, treated by a physician and/or other health professional, or x-rayed for any reason other than personal injury? If so, state each plaintiff so involved, the name and address of each such hospital and/or clinic, physician, technician and/or other health care professional, the approximate date of such confinement or service and state the reason for such confinement or service;
   (b) That any plaintiff has suffered any serious personal injury and/or illness prior to the date of the occurrence? If so, state the name of each plaintiff so involved and state when, where and how he or she was injured and/or ill and describe the injuries and/or illness suffered;
   (c) That any plaintiff has suffered any serious personal injury and/or illness since the date of the occurrence? If so, state the name of each plaintiff so involved and state when, where and how he or she was injured and/or ill and describe the injuries and/or illness suffered;
   (d) That any plaintiff has ever filed any other suit for his or her own personal injuries? If so, state the name of each plaintiff so involved and state the court and caption in which filed, the year filed, the title and docket number of the case.

Answer: Defendant objects that interrogatory number 7 is overly broad, burdensome, and not reasonably calculated to lead to the discovery of admissible evidence from Defendant. Answering further and without waiving said objection, No, Defendant has no such information at this time.

8. Were any photographs, movies and/or videotapes taken of the scene of the occurrence or of the persons involved? If so, state the date or dates on which such photographs, movies and/or videotapes were taken, the subject thereof, who now has custody of them, and the name, address and occupation and employer of the person taking them.

Answer: Defendant objects to Interrogatory 8 on the grounds that it is unclear, overly broad, and burdensome. Plaintiffs do not define which "occurrence" the interrogatory refers to making it impossible for Defendants to provide an answer as Plaintiffs have raised multiple allegations against Defendant involving separate occurrences over multiple years. Answering further and without waiving said objection, Defendants have provided photographs and videos in its possession which depict the property during the the time period involved in this suit, the majority of which were obtained from 30 Degree Designs instagram account and were presumably taken by Defendants.

9. Have you (or has anyone acting on your behalf) had any conversations with any person at any time with regard to the manner in which the occurrence complained of occurred, or have you overheard any statements made by any person at any time with regard to the injuries complained of by plaintiff or the manner in which the occurrence complained of occurred? If the

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answer to this interrogatory is in the affirmative, state the following:
(a) The date or dates of such conversations and/or statements;
(b) The place of such conversations and/or statements;
(c) All persons present for the conversations and/or statements;
(d) The matters and things stated by the person in the conversations and/or statements;
(e) Whether the conversation was oral, written and/or recorded; and
(f) Who has possession of the statement if written and/or recorded.

Answer: Defendant objects to Interrogatory 9 on the grounds that it is unclear, overly broad, and burdensome. Plaintiffs do not define which "occurrence" the interrogatory refers to making it impossible for Defendants to provide an answer as Plaintiffs have raised multiple allegations against Defendant involving separate allegations occurring over multiple years. It would be overly burdensome for Defendant to recount every statement made or overheard by any person at anytime regarding every occurrence alleged in the complaint, and such a request is not reasonably tailored to discover admissible evidence. Without waiving said objections, Defendant states that the only person known to have been present when the fire originated was Plaintiff Behmer according to reports obtained from the Chicago Fire Department he appears to be the only individual to witness the manner in which the fire broke out.

(a) on or around February 7, 2023
(b) Plaintiff Behmer was interviewed by Fire investigators at Stroger hospital
(c) Plaintiff Behmer and Fire Marshall Rowland, unknown if anyone else was present
(d) Behmer related that he had been living in the unit for over one year. "Today, he ob served a fire in the RV stored in the building. At this time, he grabbed a fire extinguisher and used it to extinguish the fire but it was of no use. He grabbed the dog to exit the building and it began biting him. related that an electric space heater was in the RV and in use. That he sleeps in the upstairs old locker-room which also contains two spacer heaters that are in use. He related no work has recently been done to the building. He is the only one living in the building and does not know the landlord's information."
(e) the statement was made orally and recorded in the Chicago Fire Department Reports
(f) Chicago Fire Department

10. Do you know of any statements made by any person relating to the occurrence complained of by the plaintiffs? If so, give the name and address of each such witness and the date of the statement, and state whether such statement was written and/or oral.

Answer: Defendant objects to Interrogatory 10 on the grounds that it is unclear, overly broad, and burdensome. Plaintiffs do not define which "occurrence" the interrogatory refers to making it impossible for Defendants to provide an answer as Plaintiffs have raised multiple allegations against Defendant involving separate allegations occurring over multiple years. Without waving said objection Defendant states that Bryon Finke gave oral statements to arson detective Kazimeirski from the Chicago Police Department as well as Fire Marshall Rowland from the Chicago Fire Department following the fire on or around February 7, 2023. On information and be-

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lief, Plaintiff Behmer also made statements to investigators from the Chicago Police and Fire Department following the fire.

11. Have you ever been convicted of a misdemeanor involving dishonesty, false statement or a felony? If so, state the nature thereof, the date of the conviction, and the court and the caption in which the conviction occurred. For the purpose of this interrogatory, a plea of guilty shall be considered as a conviction.

Answer: No.

12. Had you used any drugs or medications within 24 hours immediately prior to the occurrence? If so, state the names and addresses of those from whom it was obtained, where it was used, the particular kind and amount of drug or medication so used by you, and the names and current residence addresses of all persons known by you to have knowledge concerning the use of the drug or medication.

Answer: Defendant objects to interrogatory Number 12 on the grounds that it is unclear what "occurrence" Plaintiff's interrogatory refers to as Plaintiffs have raised multiple allegations against Defendant involving separate occurrences over multiple years. Answering further, without waiving said objection, Defendant states that it is an Illinois Limited Liability Company, not an individual capable of consuming drugs or medications.

13. Were you employed on the date of the occurrence? If so, state the name and address of your employer, and the date of employment and termination, if applicable. If your answer is in the affirmative, state the position, title and nature of your occupational responsibilities with respect to your employment.

Answer: Defendant objects to interrogatory Number 13 on the grounds that it is unclear what "occurrence" Plaintiff's interrogatory refers to as Plaintiffs have raised multiple allegations against Defendant involving separate occurrences over multiple years. Answering further and without waiving said objection, Defendant states that it is a Limited Liability Company and not an individual capable of holding employment.

14. What was the purpose and/or use for which the property at issue was being operated at the time of the occurrence?

Answer: Defendant objects to interrogatory Number 14 on the grounds that it is unclear. Further, Plaintiffs have not defined the "occurrence" Plaintiff's interrogatory refers to, as Plaintiffs have raised multiple allegations against Defendant involving separate occurrences over multiple years. Answering further without waiving said objection, Defendant states that the property was leased to Plaintiffs for the purpose of using it as a commercial warehouse space. Defendant allege that Plaintiffs violated their lease agreement by operating an illegal nightclub on the premis-

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es, and by Plaintiff Behmer using the premises as a personal residence.

15. State the names and addresses of all persons who have knowledge of the purpose for which the property was being used at the time of the occurrence.

Answer: Defendant objects to interrogatory Number 15 on the grounds that it is unclear as Plaintiffs have not defined which "occurrence" this interrogatory refers to. Defendants cannot answer as Plaintiffs have raised several allegations against Defendant involving separate occurrences over multiple years. Answering further without waiving said objection, Defendant states that during all relevant times the property was leased to and occupied by Plaintiffs. Answering further Defendant states on information and belief that sometime prior to June 2022 unknown authorities at the City of Chicago became aware that the property was being used as an illegal nightclub.

16. State the name and address of each owner and manager of GP OPPORTUNITY FUND, LLC.

Bryon Finke

17. State whether you were subject to City of Chicago demolition and/or code violations for the subject premises within 5 years prior to the occurrence, what was the citation, what was the resolution and the case numbers and/or code violation numbers.

Answer: Defendant objects to the relevance of the interrogatory as any previously closed violations have no bearing on the present case, and because it is unclear as to which "occurrence" Plaintiff is referring. Answering further without waiving said objections, Defendant states that it had not been cited for any building code violations at the property in the 5 years prior to the June 17, 2022 raid by the City of Chicago that was prompted by Plaintiff's illegal use of the premises as a public place of amusement.

18. List the names and addresses of all other persons (other than yourself and persons heretofore listed) who have knowledge of the facts of the occurrence and/or of the injuries and damages claimed to have resulted therefrom.

Answer: None known at this time.

19. Identify any statements, information and/or documents known to you and requested by any of the foregoing interrogatories which you claim to be work product or subject to any common law or statutory privilege, and with respect to each interrogatory, specify the legal basis for the claim as required by Illinois Supreme Court Rule 201(n).

Exhibit B 7/10

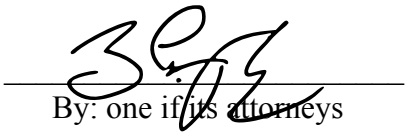
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Answer: None known at this time.

Respectfully yours,

GP Opportunity Fund, LLC

DATE: July 7, 2024



By: one if its attorneys

Zachary D. Limbaugh
Attorney for Defendant
417 West Superior Street
Chicago, Illinois 60654
Phone:(312) 612-9225
Attorney ID # 49252
ARDC # 6306446
Limbaugh@LimbaughLawFirm.com

Exhibit B 8/10

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VERIFICATION BY CERTIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this Defendant and Counter-Plaintiff's Answers to Plaintiff and Counter-Defendant's First Set of Interrogatories are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.



Exhibit B 9/10

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CERTIFICATE OF SERVICE

On July 11, 2024, I , Zachary Limbaugh, an attorney, caused to be served via email the foregoing Defendant and Counter-Plaintiff's Answers to Plaintiff and Counter-Defendant's First Set of Interrogatories to the persons or firms listed:

Weiss Ortiz, P.C.
1011 E. 31st Street
La Grange Park, IL 60526
info@weissortizlaw.com
Firm No. 40058



Zachary D. Limbaugh

Zachary D. Limbaugh
Attorney for Defendant GP Opportunity Fund
417 West Superior Street
Chicago, Illinois 60654
Phone:(312) 612-9225
Attorney ID # 49252
ARDC # 6306446
Limbaugh@LimbaughLawFirm.com

Exhibit B 10/10

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Gmail Kenneth Mayle <ken.mayle@gmail.com>

Re: 30 Degree Design, LLC, Brad Behmer, and Kenneth Mayle v. GP Opportunity Fund, LLC Case No. 2022 L 010246 — Cook County Circuit Court, Law Division, Calendar Y Rule 201(k) Conference Demand / Rule 213(i) Supplementation Demand

Kenneth Mayle <ken.mayle@gmail.com> Sat, Jun 13, 2026 at 9:14 PM
To: Zachary Limbaugh <Limbaugh@limbaughlawfirm.com>

Zachary D. Limbaugh
The Limbaugh Law Firm
417 West Superior Street
Chicago, Illinois 60654
Limbaugh@LimbaughLawFirm.com

Apologies, it took me a minute to know the proper rule to cite (apparently 201(k)). I plan on asking the court AGAIN to strike the trial date as there is merely too much to do here in the time I can allocate with other commitments. It should of not been set so soon.

Dear Mr. Limbaugh:

Pursuant to Illinois Supreme Court Rule 201(k), I write to demand compliance with the following discovery obligations prior to seeking court intervention.

1. UNVERIFIED INTERROGATORY ANSWERS — RULE 213(d)

Your client's Answers to Plaintiffs' First Set of Interrogatories served July 11, 2024 are unverified. The Verification by Certification page bears no signature of Bryon Finke or any authorized officer of GP Opportunity Fund, LLC. This is required by Rule 213(d). Counsel's signature on what appears all signatures (one difficult to identify) including the Certificate of Service does not satisfy this requirement.

2. FALSE AND INCOMPLETE ANSWERS — RULE 213(i)

Your client's interrogatory answers contain material inaccuracies and omissions that require supplementation under Rule 213(i), including but not limited to:

— Interrogatory No. 17: Your client's answer that it was not subject to any buildingvcode violations in the five years prior to the occurrence is false. This answer
fails to account for, among other things, fire protection and fire suppressionsystem code violations and inspection failures during the specified period.

— Interrogatory No. 5: Your client's answer regarding the property and repairs is incomplete on its face.

— Interrogatory No. 1 and No. 16: Your client's answers regarding identity, ownership structure, and beneficial interest in the subject property are
incomplete and require supplementation.

— All other answers rendered inaccurate or incomplete by information obtained through subpoena and discovery since July 11, 2024 or in some cases merely public data but not cited.

Exhibit C 1/2

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3. DEMAND FOR COMPLIANCE

Please contact me within 7 days to confer as required by Rule 201(k).

Please serve properly verified and supplemented answers within 14 days of this letter.

Failure to comply will result in a Motion to Compel and for Sanctions under Rules 201(k) nand 219(c), seeking orders barring evidence, *requesting to strike the trial schedule*, an adverse inference instruction, costs, and all other relief the Court deems appropriate. The Court's Case Management Order of May 18, 2026 expressly provides that failure to comply is grounds for Rule 219(c)bsanctions.

This letter will be attached as an exhibit to any such motion.

Respectfully,

Kenneth Mayle
1034 N. Karlov Ave

248-635-7455

Case No. 2022 L 010246

Exhibit C 2/2