IN THE CIRCUIT COURT OF COOK COUNTY
COUNTY DEPARTMENT--LAW DIVISION

ROD SACHARNOSKI,	)	
Plaintiff,	)	No. 01 L 015378
v.	)	
DON CUNNINGHAM and JEFF BOLER,	)	
Defendants.	)	

MOTION OF DEFENDANT CUNNINGHAM FOR SUMMARY JUDGMENT ON COUNTS I AND II OF AMENDED COMPLAINT

Defendant Don Cunningham, by his attorney, moves for summary judgment on Counts I and II of the Amended Complaint. In support of his motion, Cunningham submits his memorandum of law and affidavit, incorporating them into this motion as if fully stated herein.

WHEREFORE, Cunningham prays that:

a) Summary Judgment enter in his favor on Count I on the alleged statements in Amended Complaint ¶6(a-e), as he did not publish the same;

b) Summary Judgment enter in his favor on all claims for defamation per se in Count I;

c) Summary Judgment enter in his favor on all claims for false light invasion of privacy in Count II on the I on the alleged statements in Amended Complaint ¶6(a-e), as he did not publish the same; and

d) Summary Judgment enter in his favor on all claims for false light invasion of privacy for the alleged statements in Amended Complaint ¶6(a-e), as there was no invasion of privacy.