

**IN THE CIRCUIT COURT OF THE FOURTH JUDICIAL CIRCUIT
MONTGOMERY COUNTY, ILLINOIS**

MATT HUGHES,)
)
 Plaintiff,)
)
 v.)
)
 MARK HUGHES,)
)
 Defendant.)

Case No.

COMPLAINT

NOW COMES the Plaintiff, MATT HUGHES, by and through his attorney, Christopher E. Sherer of Giffin, Winning, Cohen & Bodewes, P.C., and complains of the Defendant, MARK HUGHES, as follows:

1. The Plaintiff is a resident of the State of Illinois.
2. The Defendant is a resident of Hillsboro, Montgomery County, Illinois.
3. The Plaintiff and the Defendant are twin brothers.
4. This Court has jurisdiction over the present action pursuant to the provisions of 735 ILCS 5/2-701.
5. Venue is proper.
6. For essentially the entirety of their lives, and for the several years last past, the parties have been engaged in farming.
7. During the course of the parties' adult lives, and for the several years last past, the parties have individually and, at times, collectively purchased farming equipment and other items of personal property.

8. During the course of the parties' adult lives, and for the several years last past, the parties have, on occasion, allowed each other to use certain items farming equipment and other items of personal property owned by the other party.

9. At various times throughout their adult lives, and for the several years last past, the parties have stored farming equipment and other items of personal property at their respective residences and on their respective properties, some of which may have been owned individually and some of which may have been owned by both parties.

10. The parties have never entered into a written partnership agreement with one another with regard to the ownership and use of such farming equipment and other items of personal property that was or is jointly owned, if any.

11. A dispute has arisen between the parties as to the ownership of certain items of farming equipment and other items of personal property, including, but not limited to, certain tractors and bulldozers.

12. There exists an actual controversy between the Plaintiff and the Defendant regarding the respective parties' right, title, and ownership in and to certain items of farming equipment and other personal property.

13. Plaintiff is entitled to a declaratory judgment regarding the respective parties' right, title, and ownership in and to certain items of farming equipment and other personal property.

14. This Court should make a declaration of the rights of the parties.

WHEREFORE, the Respondent, MATT HUGHES, respectfully requests that this Honorable Court enter an appropriate Order declaring the parties' rights as outlined hereinabove and granting such other relief that is just and proper.

Respectfully Submitted,

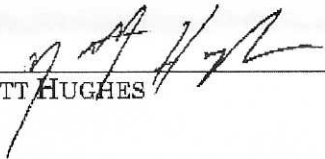
MATT HUGHES, Respondent

By: /s/ Christopher E. Sherer
One of His Attorneys

Christopher E. Sherer, ARDC #6275910
csherer@GiffinWinning.com
GIFFIN, WINNING, COHEN & BODEWES, P.C.
efile@GiffinWinning.com
Post Office Box 2117
Springfield, IL 62705-2117
(217) 525-1571

CERTIFICATION

Under penalties as provided by law pursuant to §1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument 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/she truly believes the same to be true.



MATT HUGHES

Dated: 3-7-19, 2019