

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

MILDRED CRESPO,

Plaintiff,

v.

ROSITA LOPEZ,

Defendant.

No. 2025 L 009086

Calendar Y

Hon. John J. Tully, Jr.

PLAINTIFF'S REPLY TO DEFENDANT'S AFFIRMATIVE DEFENSES

Plaintiff Mildred Crespo ("Plaintiff" or "Mildred"), by her attorney, Thomas D. Rosenwein of Rosenwein Law Group, pursuant to Section 2-602 of the Illinois Code of Civil Procedure, hereby files her Reply to Defendant's Affirmative Defenses, as follows:

1. Plaintiff's claims are barred in this Court pursuant to the Eleventh Amendment, State Lawsuit Immunity Act, and Illinois Court of Claims Act as argued in Dr. Lopez's Motion to Dismiss.

Reply: Denied.

2. Any and all alleged defamatory statements made by Dr. Lopez were true or substantially true, which is an absolute defense to Plaintiff's defamation claim.

Reply: Denied.

3. Any and all alleged defamatory statements made by Dr. Lopez are subject to a qualified privilege that protects Dr. Lopez from liability for statements made in a legitimate business context.

Reply: Denied, lacks factual allegations, lacks specificity as to "qualified privilege" and "legitimate business context," and should be stricken.

4. Any alleged defamatory statements made by Dr. Lopez that are statements of opinion are non-actionable and protected by Illinois law and the First Amendment.

Reply: Denied, lacks factual allegations, does not specify any "statements of opinion," is speculative, and should be stricken.

WHEREFORE, Plaintiff Mildred Crespo request that requests that the relief prayed for by Defendant be denied, that judgment be entered in favor of Plaintiff on all Counts, and that the Court award such further relief as it may deem just and proper.

Dated: February 4, 2026

MILDRED CRESPO

By: Thomas D. Rosenwein

Thomas D. Rosenwein
One of Plaintiff's Attorneys

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PROOF OF SERVICE

The undersigned served a copy of the attached Reply to Respondent's Affirmative Defenses to each person named below by email or first-class mail addressed as follows on February 4, 2026:

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