

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

MICHAEL JORDAN,

Plaintiff,

v.

KARLA KNAFEL,

Defendant.

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No.

02CH19143

FILED

OCT 23 2002

DOROTHY BROWN
CLERK OF CIRCUIT COURT

COMPLAINT FOR DECLARATORY JUDGMENT AND INJUNCTION

Plaintiff Michael Jordan, by his attorneys, for his complaint against defendant Karla Knafel states as follows:

1. The acts out of which this cause of action arose occurred in Chicago, Illinois.
2. More than a decade ago, Mr. Jordan had a relationship with Ms. Knafel.
3. Under threat of publicly exposing that relationship, Ms. Knafel extorted Mr. Jordan into agreeing to pay and paying her \$250,000.
4. Ms. Knafel, through her attorneys, has attempted to extort additional money from Mr. Jordan. The extortion demands were communicated to Mr. Jordan's attorney in Chicago, Illinois.
5. The extortion demands threatened to publicly expose the now decade-old relationship unless Mr. Jordan paid Ms. Knafel \$5,000,000 pursuant to a purported second agreement.
6. Mr. Jordan never agreed to pay Ms. Knafel any amount – let alone \$5,000,000 – in addition to the \$250,000 he previously paid her not to publicly expose their relationship. Moreover, any alleged agreement for any such payment would be unenforceable against Mr.

Jordan because (i) extortion agreements violate public policy; (ii) there would be no consideration to support any such agreement due to Ms. Knafel's existing obligation not to publicly expose the relationship; (iii) any such agreement would violate the statute of frauds since there is no agreement or writing signed by Mr. Jordan; and (iv) any such agreement would be barred by the applicable statute of limitations.

WHEREFORE, Mr. Jordan requests that this Court enter an order declaring that Ms. Knafel's demand that Mr. Jordan pay her an additional \$5,000,000 not to publicly expose their decade-old relationship is unenforceable, enjoining Ms. Knafel and any other persons acting on her behalf from engaging in any further efforts to extort money from Mr. Jordan, and granting Mr. Jordan such other and further relief as this Court deems just and proper.

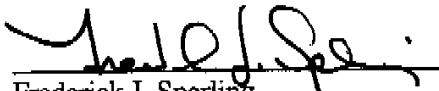
JURY DEMAND

Mr. Jordan demands a trial by jury on all issues so triable.

Dated: October 23, 2002

SCHIFF HARDIN & WAITE

By:



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