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Mariyana T. Spyropoulos
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Chancery Division Civil Cover Sheet
General Chancery Section

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

Dyanna Burt-Finnie, on her behalf and on behalf of all others
Plaintiff
v.
South Chicago Chapel, Inc., a domestic corporation,
Defendant

2026CH07700
Case No: _____

CHANCERY DIVISION CIVIL COVER SHEET
GENERAL CHANCERY SECTION

A Chancery Division Civil Cover Sheet - General Chancery Section shall be filed with the initial complaint in all actions filed in the General Chancery Section of Chancery Division. The information contained herein is for administrative purposes only. Please check the box in front of the appropriate category which best characterizes your action being filed.

Only one (1) case type may be checked with this cover sheet.

- 0005 ☐ Administrative Review

0001 ☒ Class Action

0002 ☐ Declaratory Judgment

0004 ☐ Injunction

0007 ☐ General Chancery

0010 ☐ Accounting

0011 ☐ Arbitration

0012 ☐ Certiorari

0013 ☐ Dissolution of Corporation

0014 ☐ Dissolution of Partnership

0015 ☐ Equitable Lien

0016 ☐ Interpleader
- 0017 ☐ Mandamus

0018 ☐ Ne Exeat

0019 ☐ Partition

0020 ☐ Quiet Title

0021 ☐ Quo Warranto

0022 ☐ Redemption Rights

0023 ☐ Reformation of a Contract

0024 ☐ Rescission of a Contract

0025 ☐ Specific Performance

0026 ☐ Trust Construction

0050 ☐ Internet Take Down Action (Compromising Images)

☐ Other (specify) _____

☒ Atty. No.: 45052 ☐ Pro Se 99500

Atty Name: Michael Haeberle

Atty. for: Plaintiff

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City: Chicago State: IL

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Pro Se Only: ☐ I have read and agree to the terms of the Clerk's Clerk's Office Electronic Notice Policy and choose to opt in to electronic notice from the Clerk's office for this case at this email address:

Email: _____

Mariyana T. Spyropoulos, Clerk of the Circuit Court of Cook County, Illinois
cookcountyclerkofcourt.org

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

Dyanna Burt-Finnie, on her behalf
and on behalf of all others similarly
situated,

Plaintiffs,

v.

South Chicago Chapel, Inc.,
a domestic corporation,

Defendants.

Case No.:

JURY TRIAL DEMANDED

Class Action Complaint and Demand for Jury Trial

Plaintiff Dyanna Burt-Finnie (“Plaintiff” or “Burt-Finnie”) brings this Class Action Complaint and Demand for Jury Trial against Defendant South Chicago Chapel, Inc. (“South Chicago” or “Defendant”) regarding Defendant’s ongoing mishandling and misidentification of human remains at its funeral home facility. Plaintiff, through undersigned counsel, for her Class Action Complaint against South Chicago, alleges as follows upon personal knowledge as to herself and her own acts and experiences and, as to all other matters, upon information and belief:

Parties

1. Plaintiff is an adult individual residing in Fort Bend County, Texas. Plaintiff brings this action individually and as the representative of a class of similarly situated individuals.
2. Defendant South Chicago Chapel, Inc. is an Illinois corporation which owns, operates, manages, and oversees a funeral home located at

2939 East 95th Street, Chicago, Illinois, in the South Deering neighborhood of Chicago's Southeast Side.

3. At all relevant times herein, Defendant held itself out to the public as a competent funeral home, offering services related to the disposition of human remains.

Jurisdiction and Venue

4. Jurisdiction is proper under Article VI, Section 9 of the Illinois Constitution.

5. Venue is proper in Cook County pursuant to 735 ILCS 5/2-101 and 5/2-102 because Defendant resides and does business in Cook County, and the events that gave rise to this action occurred there.

Facts

6. At all relevant times herein, Defendant South Chicago Chapel was an Illinois corporation organized and licensed to do business and existing under the laws of the State of Illinois.

7. At all relevant times herein, South Chicago held itself out to the public as a competent funeral home located on the 2900 block of East 95th Street, Chicago, Illinois, offering services related to the storage, preservation, and appropriate disposition of human remains.

8. Upon information and belief, the registered funeral director for South Chicago Chapel is Johanna Morgan. Upon information and belief, Clark Morgan also operated as the funeral director at South Chicago Chapel.

9. On or about Tuesday, August 4, 2026, Plaintiff's father Terrance

Fallie ("Mr. Fallie"), passed away.

10. Plaintiff is the adult daughter of Mr. Fallie and his surviving next of kin.

11. On or about August 4, 2026, South Chicago took possession of Mr. Fallie's body for the purpose of funeral services and appropriate disposition of Mr. Fallie's remains.

12. At the aforesaid time, and all relevant times herein, Defendant represented that it was competent and qualified to take possession of Mr. Fallie's body for the purposes of its safe storage, preservation, and appropriate disposition.

13. Plaintiff became liable to pay Defendant for funeral and/or disposition services related to Mr. Fallie's remains pursuant to 755 ILCS 65/5(4).

14. Two days later, on or about Thursday, August 6, 2026, representatives on behalf of Plaintiff and her family went to South Chicago in person to retrieve Mr. Fallie's body for removal to a different funeral home.

15. Upon arriving at South Chicago, said representatives found city and county officials, including Cook County Medical Examiner investigators and forensic pathologists, removing approximately 57 decomposing bodies from Defendant's funeral home.

16. The approximately 57 bodies found at Defendant's funeral home had been mishandled and mislabeled, including the body of Mr. Fallie.

17. The Cook County Medical Examiner's Office took possession of the approximately 57 bodies, including Mr. Fallie, and is currently in the process of identifying them and notifying their families.

18. Upon information and belief, a complaint filed on or about Monday, August 3, 2026, alleged that remains at South Chicago Chapel were not being properly stored at or below 40 degrees Fahrenheit in accordance with state regulations.

19. The Illinois Department of Financial and Professional Regulation ("IDFPR") revoked South Chicago Chapel's business license on or about Wednesday, August 5, 2026.

20. During a walkthrough of the facility on or about Thursday, August 6, 2026, a state regulator and law enforcement officers encountered the remains of 57 people stored in different areas of the funeral home, unrefrigerated and in various states of decomposition.

21. Upon information and belief, Clark Morgan, identified as the funeral director, initially refused police access to the premises without a warrant, locked the doors to the funeral home, and left the scene. Chicago Fire Department personnel subsequently forced entry into the funeral home.

22. Upon information and belief, the IDFPR temporarily suspended Johanna Morgan's funeral director and embalmer license because "Respondent's continued practice is a danger to the public safety, interest and welfare due to Respondent allowing multiple decedents to be kept in an unrefrigerated area with deplorable conditions including

rodent infestation, causing decomposition and maggot infestation of the bodies.”

23. Upon information and belief, neighbors had smelled an odor akin to a dead animal emanating from Defendant’s funeral home for approximately two months prior to the discovery.

24. Upon information and belief, Clark Morgan was previously connected to a 2025 south suburban Chicago Heights crematory shutdown in which the remains of more than 100 bodies were found improperly stored, and more than 20 lawsuits were filed.

25. Upon information and belief, Clark Morgan’s funeral director and embalmer intern license had previously been revoked by the IDFPR in 2024.

26. Defendant failed to properly affix identifying information to the bodies in its possession, including that of Mr. Fallie, despite knowing the same would be necessary in properly identifying the bodies.

27. Defendant failed to maintain a proper inventory of the bodies in its possession, including that of Mr. Fallie, despite knowing the same was necessary in properly identifying said bodies.

28. Defendant failed to enact and/or observe appropriate policies, procedures, and standards for the custody, identification, preservation, storage, and disposition of the bodies in its possession, despite knowing the same was necessary to properly care for and identify said bodies.

29. Defendant failed to store remains at or below 40 degrees Fahrenheit in accordance with state regulations, causing the decomposition of bodies in its possession, including that of Mr. Fallie.

30. Mr. Fallie left no written instructions regarding the disposition of his remains.

31. Mr. Fallie was not married at the time of his death.

32. As surviving competent adult child of Mr. Fallie, Plaintiff had a superior right to control the disposition of Decedent's remains under 755 ILCS 65/5.

Class Allegations

33. **Class Definition:** Plaintiff brings this action pursuant to 735 ILCS 5/2-801 on behalf of herself and a Class of similarly situated individuals, defined as follows:

- a. All individuals who are the next of kin, as defined by 755 ILCS 65/5, or authorized representatives of decedents whose remains were in the possession of South Chicago Chapel, Inc. at or around the time of the discovery on or about August 6, 2026, and whose remains were mishandled, improperly stored, mislabeled, allowed to decompose, and/or otherwise subjected to the conditions described herein.

34. **Numerosity:** The exact number of Class members is unknown to Plaintiff at this time, but joinder of all members is impracticable. On information and belief, approximately 57 decedents' remains were recovered from Defendant's funeral home, each of whom has one or more surviving next of kin or authorized representative. The members of the Class are readily identifiable through Defendant's records, the Cook

County Medical Examiner's records, and other official documentation.

35. **Commonality and Predominance:** There are numerous questions of law and fact common to Plaintiff and the Class, which predominate over any questions affecting only individual members. These common questions include, but are not limited to:

- a. Whether Defendant failed to properly store, preserve, and refrigerate the remains of Plaintiff's and Class members' decedents in accordance with state regulations;
- b. Whether Defendant failed to properly identify, mark, label, and inventory the remains of Plaintiff's and Class members' decedents;
- c. Whether Defendant failed to enact and/or observe appropriate policies, procedures, and standards for the custody, identification, preservation, and disposition of human remains;
- d. Whether Defendant's acts and/or omissions constituted tortious interference with Plaintiff's and Class members' right to possess and appropriately dispose of their decedents' remains;
- e. Whether Defendant's conduct was extreme and outrageous so as to constitute intentional infliction of emotional distress;
- f. Whether Defendant violated the Disposition of Remains Act, 755 ILCS 65/1 et seq.;
- g. Whether Defendant made false statements and/or omissions of fact to Plaintiff and Class members regarding the custody and disposition of their decedents' remains;
- h. Whether Defendant acted willfully and wantonly in its treatment of the remains in its possession; and
- i. The measure and amount of damages sustained by Plaintiff and the Class.

36. **Adequate Representation:** Plaintiff will fairly and adequately represent and protect the interests of the Class. Plaintiff has retained counsel

experienced in civil litigation on behalf of plaintiffs, including funeral home negligence litigation and litigation related to the wrongful disposition of remains, Illinois negligence law generally, and class actions. Plaintiff's interests are not antagonistic to the interests of the Class, and Defendant has no unique defenses applicable only to Plaintiff.

37. Appropriateness: A class action is appropriate because joinder of all Class members is impracticable, and class treatment is the most fair and efficient method of resolving this controversy. Individual litigation would be prohibitively costly for many Class members, and it would risk inconsistent adjudications. By contrast, a class action promotes judicial economy, provides consistency, and ensures that all similarly situated individuals receive equal treatment and relief for Defendant's unlawful conduct.

Count I
Tortious Interference with Plaintiff's and Class Members' Right to Possess Remains

38. Plaintiff restates the allegations in Paragraphs 1 through 37 as though fully set forth herein.

39. At the aforesaid time, and at all relevant times herein, Defendant owed a duty to Plaintiff and Class members not to interfere with their right to the possession and appropriate disposition of their decedents' remains.

40. At the aforesaid time, and at all relevant times herein, Defendant breached its aforesaid duty to Plaintiff and Class members through one or more of the following acts and/or omissions:

- a. Failing to exercise reasonable care in the identification and marking of the remains of Plaintiff's and Class members' decedents, including but not limited to failing to properly affix identifying information to and/or inventory the bodies so as to avoid misidentification;
- b. Failing to enact and/or observe appropriate policies, procedures, and/or standards for the maintenance, identification, storage, preservation, and/or processing of human remains including those belonging to Plaintiff's and Class members' decedents;
- c. Failing to maintain an accurate log and/or inventory of the identity and location of bodies in Defendant's possession;
- d. Relying solely on insufficient and/or inaccurate means of identification in the custody and processing of the bodies in Defendant's possession;
- e. Failing to properly identify and/or mislabeling the remains of Plaintiff's and Class members' decedents;
- f. Failing to properly store the remains at or below 40 degrees Fahrenheit as required by state regulations, causing decomposition;
- g. Failing to properly prepare and/or preserve the bodies of Plaintiff's and Class members' decedents;
- h. Retaining possession of the bodies without making appropriate disposition, causing them to decompose;
- i. Failing to make appropriate disposition of the remains, so that said bodies decomposed to various states rendering them difficult or impossible to identify;
- j. Wrongfully withholding from Plaintiff and Class members their decedents' remains; and
- k. Allowing rodent infestation and maggot infestation of the bodies in deplorable conditions.

41. Defendant's foregoing acts and/or omissions violated the prevailing standards of practice in the funeral home industry.

42. As a funeral home licensed by the State of Illinois, Defendant knew the foregoing acts and/or omissions violated the prevailing standards of practice in the industry.

43. As a direct and proximate result of one or more of the aforesaid acts and/or omissions of Defendant, Plaintiff and Class members suffered injuries and damages of a personal, pecuniary, and permanent nature, including but not limited to emotional distress and mental anguish.

WHEREFORE, Plaintiff Dyanna Burt-Finnie, individually and on behalf of all others similarly situated, respectfully requests this Court enter judgment against Defendant South Chicago Chapel, Inc. for damages in an amount greater than Fifty Thousand Dollars (\$50,000.00) plus costs of this suit.

Count II Intentional Infliction of Emotional Distress

44. Plaintiff restates the allegations in Paragraphs 1 through 37 as though fully set forth herein.

45. At the aforesaid time, and at all relevant times herein, Defendant acted willfully and wantonly and with deliberate and conscious disregard for Plaintiff and Class members through one or more of the following acts and/or omissions:

- a. Recklessly failing to properly store, preserve, and refrigerate the remains of Plaintiff's and Class members' decedents, causing

them to decompose;

- b. Recklessly failing to properly affix identifying information to and/or inventory the bodies so as to avoid misidentification;
- c. Recklessly failing to maintain an accurate log and/or inventory of the identity and location of bodies in Defendant's possession, in knowing violation of industry standards;
- d. Recklessly failing to enact appropriate policies, procedures, and/or standards for the maintenance, identification, storage, preservation, and/or processing of human remains, in knowing violation of industry standards;
- e. Recklessly allowing rodent infestation and deplorable conditions resulting in maggot infestation of bodies in Defendant's possession; and
- f. Recklessly locking Defendant's doors and refusing access to regulators and law enforcement, thereby prolonging the deplorable conditions.

46. That the foregoing acts were extreme and outrageous given the following facts and circumstances, including but not limited to:

- a. The highly personal and sensitive nature of the disposition of human remains vis-a-vis the decedent's loved ones and next of kin;
- b. The particular emotional susceptibility and vulnerability of a decedent's next of kin and loved ones following the death of a loved one;
- c. The significantly protracted period of time during which Defendant's acts and/or omissions took place, resulting in the decomposition of multiple bodies, inability for Plaintiff and Class members to properly put their loved ones to rest, and inability to identify the remains; and
- d. The overwhelming position of power and trust Defendant occupied in carrying out such possession, preparation, storage, and disposition of human remains.

47. At the aforesaid time, and all relevant times herein, Defendant was aware its foregoing acts and/or omissions would cause severe emotional distress or had a high probability of causing severe emotional distress to Plaintiff and Class members given the foregoing facts and circumstances.

48. At the aforesaid time, and all relevant times herein, Defendant proceeded to act in conscious disregard of the aforesaid high probability its conduct would cause severe emotional distress to Plaintiff and Class members.

49. Plaintiff and Class members have in fact suffered severe emotional distress as a result of Defendant's reckless acts and/or omissions.

50. As a direct and proximate result of one or more of the aforesaid reckless acts and/or omissions of Defendant, Plaintiff and Class members have suffered injuries of a personal, pecuniary, and permanent nature including extreme emotional distress and mental anguish.

WHEREFORE, Plaintiff Dyanna Burt-Finnie, individually and on behalf of all others similarly situated, respectfully requests this Court enter judgment against Defendant South Chicago Chapel, Inc. for damages in an amount greater than Fifty Thousand Dollars (\$50,000.00) plus costs of this suit.

Count III
Disposition of Remains Act (755 ILCS 65/1 et seq.)

51. Plaintiff restates the allegations in Paragraphs 1 through 37 as though fully set forth herein.

52. At all relevant times herein, there existed an Illinois Statute commonly known as the Disposition of Remains Act (the “Act”), codified under 755 ILCS 65/1 et seq.

53. The aforesaid Act creates an express private right of action for violations thereof.

54. Defendant violated the Act by depriving Plaintiff and Class members of their right to control the disposition of their decedents’ remains as alleged herein.

55. As a direct and proximate result of the aforesaid acts of Defendant, Plaintiff and Class members suffered injuries and damages of a personal, pecuniary, and permanent nature, including but not limited to emotional distress and mental anguish.

WHEREFORE, Plaintiff Dyanna Burt-Finnie, individually and on behalf of all others similarly situated, respectfully requests this Court enter judgment against Defendant South Chicago Chapel, Inc. for damages in an amount greater than Fifty Thousand Dollars (\$50,000.00) plus costs of this suit.

Count IV
Disposition of Remains Act (755 ILCS 65/1 et seq.)
(Pleaded in the Alternative)

56. Plaintiff restates the allegations in Paragraphs 1 through 37 as though fully set forth herein.

57. This claim is pleaded in the alternative to Count III.

58. At all relevant times herein, there existed an Illinois Statute

commonly known as the Disposition of Remains Act (the “Act”), codified under 755 ILCS 65/1 et seq.

59. The aforesaid Act was enacted in order to protect the rights of a decedent’s next of kin to control and ensure the appropriate disposition of the decedent’s remains.

60. The Act was designed and intended to protect a decedent’s next of kin from the injury resulting from a funeral director and/or establishment’s failure to enact the disposition of a decedent’s remains according to the wishes of the individual with the right to control such disposition.

61. The Act defines the class of individuals having a superior right to control the disposition of a decedent’s remains under 755 ILCS 65/5.

62. Having suffered the wrongful disposition of their decedents’ remains, Plaintiff and Class members suffered the exact type of injury the Act was codified to prevent.

63. Having a superior right to control the disposition of their decedents’ remains under the Act, as alleged herein, Plaintiff and Class members were members of the class the Act was intended to protect.

64. A private right of action is consistent with the underlying purpose of ensuring redress for violations of a decedent’s next of kin’s right to control the appropriate disposition of the decedent’s remains.

65. The Act does not provide remedies or sanctions for violations thereof.

66. Implying a private cause of action under the Act is necessary to provide an adequate remedy to Defendant’s violation of the Act, because

the statute would be ineffective in preventing violations of a decedent's next of kin's right to control the disposition of the decedent's remains absent such implication.

67. Defendant violated the Act by depriving Plaintiff and Class members of their right to control the disposition of their decedents' remains as alleged herein.

68. As a direct and proximate result of the aforesaid acts of Defendant, Plaintiff and Class members suffered injuries and damages of a personal, pecuniary, and permanent nature, including but not limited to emotional distress and mental anguish.

WHEREFORE, Plaintiff Dyanna Burt-Finnie, individually and on behalf of all others similarly situated, respectfully requests this Court enter judgment against Defendant South Chicago Chapel, Inc. for damages in an amount greater than Fifty Thousand Dollars (\$50,000.00) plus costs of this suit.

**Count V
Fraud**

69. Plaintiff restates the allegations in Paragraphs 1 through 37 as though fully set forth herein.

70. Defendant made false statements and/or omissions of fact to Plaintiff and Class members, including but not limited to:

- a. Representing that Defendant maintained an accurate log and/or inventory of the identity and location of bodies in Defendant's possession;
- b. Representing that Defendant enacted and/or observed

appropriate policies, procedures, and/or standards for the maintenance, identification, storage, preservation, and/or processing of human remains including those belonging to Plaintiff's and Class members' decedents;

- c. Representing that Defendant had properly prepared and preserved the bodies of Plaintiff's and Class members' decedents;
- d. Representing that Defendant relied on sufficient and/or accurate means of identification in the custody and processing of the bodies in its possession;
- e. Representing that Defendant would make appropriate disposition of the bodies of Plaintiff's and Class members' decedents; and
- f. Omitting to disclose that remains were being stored unrefrigerated, in deplorable conditions, with rodent and maggot infestation, and in various states of decomposition.

71. Defendant made the aforesaid false statements and/or omissions of fact with the purpose of inducing Plaintiff and Class members to believe Defendant had adequately maintained, preserved, and would appropriately dispose of their decedents' bodies, and to induce payment for such services.

72. The aforesaid misrepresentations and/or omissions of fact were untrue in that Defendant had not adequately identified, maintained custody of, preserved, stored, or made appropriate disposition of the remains of Plaintiff's and Class members' decedents, contrary to Defendant's representations.

73. Defendant knew or had reason to believe the aforesaid statements and/or omissions of fact were untrue in that Defendant was actually aware it had not stored remains at or below 40 degrees Fahrenheit, had not observed proper identification and/or inventorying procedures, had

allowed rodent infestation and deplorable conditions, and had not enacted and/or observed appropriate policies, procedures, and/or standards for the maintenance, identification, preservation, and/or processing of human remains.

74. Plaintiff and Class members believed and justifiably acted in reliance on Defendant's false statements and/or omissions of fact in that they entrusted the remains of their loved ones to Defendant's care, paid for services, and relied upon Defendant to appropriately preserve, store, and dispose of their decedents' remains.

75. Defendant's false statements and/or omissions of fact were material to Defendant's fraud as alleged herein, as Plaintiff and Class members would not have entrusted the remains of their decedents to Defendant, or paid for services, but for Defendant's false statements and/or omissions.

76. As a direct and proximate result of one or more of the aforesaid acts and/or omissions of Defendant, Plaintiff and Class members suffered injuries and damages of a personal, pecuniary, and permanent nature, including but not limited to emotional distress and mental anguish.

WHEREFORE, Plaintiff Dyanna Burt-Finnie, individually and on behalf of all others similarly situated, respectfully requests this Court enter judgment against Defendant South Chicago Chapel, Inc. for damages in an amount greater than Fifty Thousand Dollars (\$50,000.00) plus costs of this suit.

Count VI
Negligent Misrepresentation

77. Plaintiff restates the allegations in Paragraphs 1 through 37 as though fully set forth herein.

78. This claim is pleaded in the alternative to Count V, above.

79. At the aforesaid time, and at all relevant times herein, Defendant owed a duty to Plaintiff and Class members to accurately communicate information regarding Defendant's custody, storage, preservation, and disposition of their decedents' remains.

80. An important part of Defendant's business is providing information necessary to and for family members such as Plaintiff and Class members.

81. At the aforesaid time, and at all relevant times herein, Defendant breached the aforesaid duty to Plaintiff and Class members by making false statements and/or omissions of material fact, including but not limited to:

- a. Representing that Defendant maintained an accurate log and/or inventory of the identity and location of bodies in Defendant's possession;
- b. Representing that Defendant enacted and/or observed appropriate policies, procedures, and/or standards for the maintenance, identification, storage, preservation, and/or processing of human remains including those belonging to Plaintiff's and Class members' decedents;
- c. Representing that Defendant had properly prepared and preserved the bodies of Plaintiff's and Class members' decedents;
- d. Representing that Defendant relied on sufficient and/or accurate means of identification in the custody and processing of the

bodies in its possession;

- e. Representing that Defendant would make appropriate disposition of the bodies of Plaintiff's and Class members' decedents; and
- f. Omitting to disclose that remains were being stored unrefrigerated, in deplorable conditions, with rodent and maggot infestation, and in various states of decomposition.

82. Defendant knew or through the exercise of reasonable care should have known its misrepresentations to Plaintiff and Class members as alleged herein were false in that, had Defendant observed proper standards of practice in the custody, preservation, storage, and disposition of decedents' remains, Defendant would have been aware of the true conditions.

83. Defendant made the aforesaid false statements and/or omissions of fact with the purpose of inducing Plaintiff and Class members to believe Defendant had adequately maintained, preserved, and stored their decedents' bodies.

84. Plaintiff and Class members acted in reliance on Defendant's false statements and/or omissions of fact in that they entrusted the remains of their loved ones to Defendant's care, paid for services, and relied upon Defendant to appropriately preserve, store, and dispose of their decedents' remains.

85. As a direct and proximate result of one or more of the aforesaid acts and/or omissions of Defendant, Plaintiff and Class members suffered injuries and damages of a personal, pecuniary, and permanent nature, including but not limited to emotional distress and mental anguish.

WHEREFORE, Plaintiff Dyanna Burt-Finnie, individually and on behalf of all others similarly situated, respectfully requests this Court enter judgment against Defendant South Chicago Chapel, Inc. for damages in an amount greater than Fifty Thousand Dollars (\$50,000.00) plus costs of this suit

Prayer for Relief

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment in Plaintiff's favor and against Defendant, and award the following relief:

- a. Certify this action as a class action pursuant to 735 ILCS 5/2-801 on behalf of all individuals who are the next of kin or authorized representatives of decedents whose remains were in the possession of South Chicago Chapel, Inc. at or around the time of the discovery on or about August 6, 2026, and whose remains were mishandled, improperly stored, mislabeled, allowed to decompose, and/or otherwise subjected to the conditions described herein;
- b. Appoint Plaintiff Dyanna Burt-Finnie as representative of the Class;
- c. Appoint Plaintiff's counsel, Garrett von Schaumburg, Michael Haeberle, and Patterson Law Firm, LLC as Class Counsel;
- d. Damages in an amount greater than Fifty Thousand Dollars (\$50,000.00) for each Plaintiff and Class member;
- e. Prejudgment interest;
- f. Attorney fees and costs; and
- g. Such other relief as this Court deems just and proper.

Jury Demand

Plaintiff demands a trial by jury on all claims so triable.

Dated: August 11, 2026

Respectfully submitted,

/s/Garrett von Schaumburg
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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

Dyanna Burt-Finnie, on her behalf
and on behalf of all others similarly
situated,

Plaintiffs,

v.

South Chicago Chapel, Inc.,
a domestic corporation,

Defendants.

Case No.:

JURY TRIAL DEMANDED

Affidavit Pursuant to Supreme Court Rule 222(B)

Michael Haeberle, being first duly sworn on oath, deposes and states as follows:

1. I am one of the attorneys for Plaintiff, Dyanna Burt-Finnie, in this cause.
2. The total amount of money damages sought in this cause does exceed \$50,000.

Further, affiant sayeth naught.

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 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 verily believes the same to be true.



Michael Haeberle