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0021280199

LIS PENDENS NOTICE (Rev. 12/4/00) CCG 0066

3293/0137 40 001 Page 1 of 12
2002-11-19 16:11:31
Cook County Recorder 46.50

IN THE CIRCUIT COURT OF
COOK COUNTY, ILLINOIS



0021280199

RICHARD KASPERSON and
LUCINDA KASPERSON
plaintiffs

v.

SLOBODAN PAVLOVIC,
MIROSLAVA PAVLOVIC
HILLCREST REAL ESTATE AND MANAGEMENT, INC.

defendants

No. 02 CH 16761

LIS PENDENS NOTICE

I, the undersigned, do hereby certify that the above entitled cause was filed in my office on the
day of _____ and is now pending in said court* and that the
property affected by said cause is described as follows:

Common Address: 5725 West Kenmore, Chicago, Illinois
PIN 14-05-406-005-000

Legal Description:

THE NORTH 35 FEET OF LOT 17 AND ALL OF LOT 18 IN BLOCK 6 IN COCHAN'S ADDITION TO EDGEWATER
IN THE EAST 1/4 OF FRACTIONAL SECTION 5, TOWNSHIP 40 NORTH, RANGE 12 EAST OF THE THIRD PRINCIPAL
MERIDIAN, IN COOK COUNTY, ILLINOIS

(* See Court Order dated November 18, 2002)

in Cook County, Illinois.

Witness my hand and the seal of said court.

Alexander D. Kerr, Jr.

Atty.No.: 26508

Name: Alexander D. Kerr, Jr. of Tishler & Wald, Ltd.

Atty.for: Plaintiffs

Clerk of the Circuit Court

Address: 200 South Wacker Drive, Suite 2600

City/State/Zip: Chicago, Illinois 60606

By

Telephone: (312)876-3800

Deputy Clerk

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

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0021280199

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

RICHARD KASPERSON, AND)
LUCINDA KASPERSON,)
Plaintiffs)
v.) No. 02 CH 16761
SLOBODON PAVLOVIC,)
MIROSLAVA PAVLOVIC, AND)
HILLCREST REAL ESTATE AND)
MANAGEMENT, INC., an Illinois) Hon. Richard A. Siebel
Corporation,) Circuit Court Judge
Defendants)

STIPULATION

Plaintiffs by their counsel, Alexander D. Kerr, Jr.,
Tishler and Wald, Ltd., and Defendants by their counsel, Andrew
B. Spiegel, hereby stipulate as follows:

RECITALS

WHEREAS, the complaint filed in this cause has been served
upon the defendants;

WHEREAS, the plaintiffs have served their motion for a
Temporary Restraining Order upon defendants which is returnable

Exhibit A

UNOFFICIAL COPY

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before this Court on Monday, September 23, 2002 at 11:30 a.m.;

WHEREAS, defendants' counsel is actively engaged in expedited litigation involving election matters and is unavailable on Monday, September 23, 2002;

WHEREAS, defendants desire to have the motion deferred until Mr. Spiegel is available to appear on their behalf;

WHEREAS, plaintiffs have indicated their willingness to defer the motion provided that their interests will not be compromised thereby;

WHEREAS, defendants have indicated that their counsel will be entering a limited and special appearance in order to, *inter alia*, contest jurisdiction and venue;

WHEREAS, plaintiffs have informed defendants that they believe that Mr. Spiegel is a material witness in the proceedings and cannot act as defendants' counsel;

WHEREAS, plaintiffs have informed defendants that they intend to seek a preliminary injunction and will be filing a motion therefore as soon as reasonably practicable;

WHEREAS, the parties have mutually indicated an interest in exploring the possibility of an expeditious resolution of their differences;

NOW THEREFORE, THE PARTIES HERETO STIPULATE AS FOLLOWS:

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TERMS

1. The recitals set forth above are incorporated here as express terms of this stipulation.
2. Defendants stipulate and agree that they will not sell, gift, lien, transfer, encumber or otherwise dispose of any of their real and personal property as set forth in Exhibit A attached hereto prior to the Court ruling on either plaintiffs' TRO motion or motion for preliminary injunction, whichever occurs first.
3. Nothing in this stipulation shall in any way prevent the defendants from asserting any defense to the motion(s) or to the complaint and this stipulation does not constitute a waiver of any defense.
4. This stipulation may be withdrawn by any party upon five (5) business days written notice served by certified mail, fax or messenger service to the other parties and their counsel.
5. It is agreed that this stipulation may be filed with the Court along with the TRO Motion and related papers on Monday, September 23, 2002.

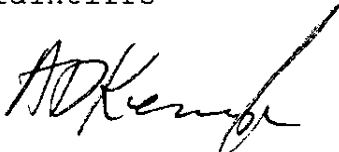
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0021280199

STIPULATED AND AGREED EFFECTIVE AS OF THE 21st DAY OF SEPTEMBER,
2002:

RICHARD KASPERSON
LUCINDA KASPERSON
Plaintiffs

BY:



One of their Attorneys

Dated:

9/21/02

SLOBODON PAVLOVIC
MIROSLAVA PAVLOVIC
HILLCREST REAL ESTATE AND
MANAGEMENT, INC.
Defendants

BY:


One of their Attorneys

Dated:

Property of Cook County Clerk's Office

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EXHIBIT A TO KASPERSONS - PAVLOVICS STIPULATION

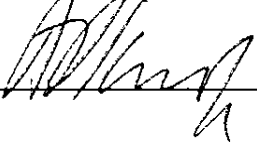
- 1) 6505-09 North Hoyne (net equity \$1,250,000);
- 2) 5725 North Kenmore Ave (net equity \$1,800,000);
- 3) 6524 North Artesian (net equity \$170,000);
- 4) 720 Gordon Terrace (net equity \$95,000);and
- 5) 6821-37 Ridge - the corner of Ridge and Farwell (net equity \$1,200,000)
- 6) No disposition of personal assets which aggregate to more than \$50,000.

Acknowledged:

On behalf of Defendants:



On behalf of Plaintiffs:



Property of Cook County Clerk's Office

Richard Katsperson
Lucinda Katsperson

0021280199

No. 02 CH 16761

v.

Slobodan Pavlovic
Miroslava Pavlovic

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Hillcrest Real Estate and Management, Inc

ORDER

This matter having come on upon Defendants' motion to strike and Dismiss and Plaintiffs' motion for Temporary Restraining Order as in the alternative Attachment, the Plaintiffs and Defendants appearing by their counsel of Record and the Court being advised of the proposed settlement as set forth below.

It is hereby ordered That

All motions are continued to June 11, 2003 and for status of settlement performance and such further action as may be appropriate

Atty. No. : _____

Name : _____

Atty. for : _____

Address : _____

City/State/Zip : _____

Telephone : _____

ENTER :

Judge

Judge's No.

Exhibit B

ORDER

UNOFFICIAL COPY

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

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v.

No.

02 CH 16761

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ORDER

Defendants, jointly and severally, agree to pay Plaintiff the sum of \$1,080,454.53 plus interest as follows:

- A. \$500,000 on or before 12/9/02;
- B. \$580,454.53 on or before 5/9/03;
- C. Interest on unpaid balances as follows:
 - i. 5% for the period 11/3/02 - 12/8/02
 - ii. 6% for the period 12/9/02 - 5/9/03
 - iii. 15% on any amounts unpaid as of 6/10/03 until paid in full

Atty. No.: _____
 Name: _____
 Atty. for: _____
 Address: _____
 City/State/Zip: _____
 Telephone: _____

ENTER: _____
 Judge _____ Judge's No. _____

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v.

ORDER

D. Contractual interest on counts III and V for the period 10/7/02 - 11/7/02

E. Plaintiffs grant the grace period on interest as set forth above for both interest and principal balance. However these balances continue to bear 6% interest for the term of grace period (11/7/02 - 6/10/03) that is actually utilized.

F. Defendants are to be credited with the payments of 10/11-2/1/02 in amounts of \$9,333.00 and \$6,355.00

Atty. No. : _____

Name : _____

Atty. for : _____

ENTER :

Address : _____

City/State/Zip : _____

Judge

Judge's No.

Telephone : _____

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

0021280199

No. 02 CH 16761

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v.

ORDER

Defendants grant Plaintiff's as security
 the properties set forth in the stipulation
 between the parties dated 9/21/02.
 Upon receipt of \$500,000 on or before
 12/9/02 two upon proof of only
 one mortgage on 5735 North Kenmore
 and not equity interest of \$100,000 there
 All other properties are released from
 the stipulation, The house remains as
 security until all payments have been
 made in full

Atty. No. : _____

Name : _____

Atty. for : _____

Address : _____

City/State/Zip : _____

Telephone : _____

ENTER :

Judge

Judge's No.

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

ORDER

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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

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ORDER

In the event that all payments have not been paid on or before 5/10/03, then Defendants agree to reimburse all of plaintiff's attorney fees and costs incurred herein.

Property of Cook County Clerk's Office

Atty. No. : _____

Name : _____

Atty. for : _____

Address : _____

City/State/Zip : _____

Telephone : _____

ENTER :

Judge

Judge's No.

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

ORDER

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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

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v.

ORDER

The following settlement agreed to by the following counsel at P.M. - parties present in Court

Richard Kasperowicz

Lucinda Kasperowicz

AIDKear

AID Kear 2012 ARDC NO 1450484 200 30 Wacker Dr

Atty. No.: Chicago IL 60655

Name: 312/676-3700

Atty. for:

Address:

City/State/Zip:

Telephone:

Andrew B Spiegel, Esq

15 Springwood Rd # 126

Chicago, IL 60621 630 325-9957

Andrew B Spiegel, Esq #22516

15 Springwood Rd # 126

Chicago, IL 60621 630 325-9957

X

JUDGE THOMAS P. QUINN

NOV 18 2002

Circuit Court-238

Judge Judge's No.

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS