

UNOFFICIAL COPY

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

RICHARD KASPERSON and)
LUCINDA KASPERSON,)

Plaintiffs,)

v.)

SLOBODAN PAVLOVIC, MIROSLAVA)
PAVLOVIC and HILLCREST REAL)
ESTATE AND MANAGEMENT, INC.,)
an Illinois Corporation,)

Defendants)



Eugene "Gene" Moore Fee: \$36.50
Cook County Recorder of Deeds
Date: 08/14/2003 02:40 PM Pa: 1 of 7

No. 02 CH 16761

Honorable Thomas P. Quinn
Circuit Court Judge

RELEASE OF LIS PENDENS

I do hereby release the Lis Pendens filed in the Cook County Recorder of Deeds Office as Document No. 0021280199, on November 19, 2002, a copy of which is attached hereto, related to the following property:

Common Address: 5725 West Kenmore, Chicago, Illinois
PIN: 14-05-406-005-0000

Legal Description:
THE NORTH 35 FEET OF LOT 17 AND ALL OF LOT 18 IN BLOCK 6 IN COCHRAN'S ADDITION TO EDGEWATER IN THE EAST 1/2 OF FRACTIONAL SECTION 5, TOWNSHIP 40 NORTH, RANGE 12 EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

Date: August 14, 2003.

RICHARD AND LUCINDA KASPERSON

Alexander D. Kerr, Jr.
By: One of Their Attorneys

Attorney No. 26508
Alexander D. Kerr, Jr.
Tishler & Wald, Ltd.
200 S. Wacker Drive, Suite 3000
Chicago, Illinois 60606
(312)876-3800

Return to:
Andrew B. Spiegel
15 Spinning Wheel Rd. #126
Hinsdale, IL 60521

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

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

RICHARD KASPERSON and LUCINDA KASPERSON plaintiffs

NOV 19 2002

0021280199

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 November 19, 2002 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 CLCHRAN'S ADDITION TO EDGEWATER IN THE EAST 1/2 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

Address: 200 South Wacker Drive, Suite 2600

City/State/Zip: Chicago, Illinois 60606

Telephone: (312)876-3800

Clerk of the Circuit Court

By

Deputy Clerk

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

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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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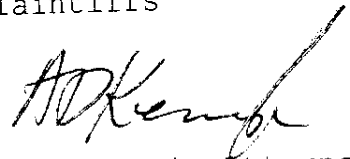
TERMS

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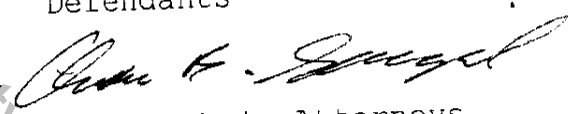
STIPULATED AND AGREED EFFECTIVE AS OF THE 21st DAY OF SEPTEMBER,
2002:

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

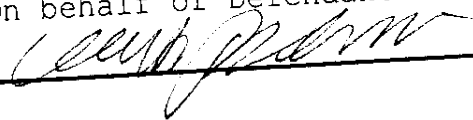
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EXHIBIT A TO KASPERSONS - PAVLOVICS STIPULATION

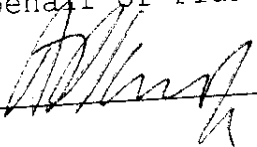
- 1) 6505-09 North Hoyne (net equity \$1,250,000);
- ✓2) 5725 North Kenmore Ave (net equity \$1,800,000);
- ✓3) 6524 North Artesian (net equity \$170,000);
- 4) 720 Gordon Terrace (net equity \$95,000);and
- ✓5) 6821-37 Ridge - the corner of Ridge and Farwell (net equity \$1,200,000)
- 6) No disposition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