

Dep. Orig.

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Doc#: 0425727111  
Eugene "Gene" Moore Fee: \$32.50  
Cook County Recorder of Deeds  
Date: 09/13/2004 03:32 PM Pg: 1 of 5

This space reserved for Recorder of Deeds

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
MUNICIPAL DEPARTMENT - FIRST DISTRICT**

**CITY OF CHICAGO, a Municipal Corporation,**

**Plaintiff,**

v.

**LAZARO HERRERA, PASCUALA TRUJILLO, and MARIANO TRUJILLO,**

**Defendants.**

**No. 03 M1-403785**

**Re: 1635 N. Keeler Avenue**

**Agreed Amendment to Agreed Order**

This case is before the Court to approve the terms of this Agreed Amendment to the Agreed Order of Settlement with Permanent Injunction entered on June 11, 2004.

The parties have read and voluntarily agreed to the terms of this Agreed Amendment. The Court makes the following findings of fact and law, and orders Defendants to comply with each of the agreements stated in this Order:

1. Defendants Lazaro Herrera and Pascuala Trujillo are two of the three co-owners of the property commonly known as 1635 North Keeler Avenue, Chicago, Illinois (the subject property”).
2. Plaintiff City of Chicago (“the City”) and Defendants Lazaro Herrera and Pascuala Trujillo entered into an Agreed Order of Settlement with a Permanent Injunction on June 11, 2004, which is attached to this Agreed Amendment as Exhibit A.
3. Defendant Mariano Trujillo is the third co-owner of the subject property and was not present in court on June 11, 2004.

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Case no. 03 M1-403785

4. Defendant Mariano Trujillo hereby agrees to be subject to the jurisdiction of this Court and to the provisions contained in the Agreed Order of Settlement with Permanent Injunction (Exhibit A), including the injunction in paragraph 6 and the enforcement provisions in paragraph 7.
5. All parties agree that this written Agreed Amendment shall be binding on all parties and that the injunction in paragraph 6 of the Agreed Order of Settlement with Permanent Injunction (Exhibit A) shall be binding on all Defendants and their successors, heirs, assignees, agents, and/or other person(s) working in concert with them or under their control.
6. Pursuant to Illinois Supreme Court Rule 304(a), this is a final order and the Court finds no just reason for delaying the enforcement of this Order. All parties waive their right to appeal this Order.
7. This case is taken off the Court's call.

Agreed to by:

Mariano Trujillo  
 Defendant Mariano Trujillo  
 Address: 1958 N. Cicero  
Chicago IL 60639

Telephone: (1773) 645 2300 (work)  
 ( ) \_\_\_\_\_ (home)

Lazaro Herrera  
 Defendant Lazaro Herrera

Pascuala Trujillo  
 Defendant Pascuala Trujillo

Attorney for the City of Chicago:

Mara S. Georges, Corporation Counsel for the City of Chicago

By: Christopher M. Grunewald  
 Christopher M. Grunewald, Assistant Corporation Counsel  
 30 N. LaSalle St., Suite 700, Chicago, IL 60602  
 (312) 744-6648 or -8791 Attorney #90909

Judge ANN HOUSER

SEP 10 2004

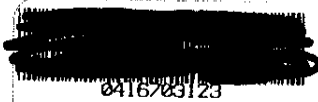
Circuit Court - 227

ENTERED:

Ann Houser  
 Judge Ann Houser Date

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Doc#: 0416703123  
Eugene "Gene" Moore Fee: \$28.50  
Cook County Recorder of Deeds  
Date: 06/15/2004 03:14 PM Pg: 1 of 3

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#90909 (Zoning)

## IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS MUNICIPAL DEPARTMENT - FIRST DISTRICT

CITY OF CHICAGO, a Municipal Corporation,

Plaintiff,

v.

LAZARO HERRERA, PASCUALA TRUJILLO, AND MARIANO TRUJILLO,

Defendants.

No. 03 M1 403785

Re: 1635 N. Keeler Avenue

Courtroom 1107

### Agreed Order of Settlement with a Permanent Injunction

This case is before the Court to approve the terms of this Agreed Order of Settlement between the plaintiff City of Chicago ("City") and Defendants Lazaro Herrera and Pascuala Trujillo ("Defendants").

The parties wish to resolve this case without a trial, and have read and agreed to the terms of this Order. The Court makes the following findings of fact and law, and orders Defendants to comply with each of the agreements listed in this Agreed Order:

1. The Court has *in personam* jurisdiction over the parties and *in rem* jurisdiction over the property located at 1635 N. Keeler Avenue, Chicago, Illinois, ("subject property") which has a permanent index number of 13-34-427-009-0000 and is legally described as:



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LOT 9 IN BLOCK 28 IN GARFIELD A SUBDIVISION OF THE SOUTHEAST 1/4 OF SECTION 34, TOWNSHIP 40 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN (EXCEPT THE WEST 307 FEET OF NORTH 631.75 FEET AND WEST 333 FEET OF SOUTH 1295 FEET THEREOF), IN COOK COUNTY, ILLINOIS.

2. The subject property contains a two-story frame residential building with an attic and a basement ("the subject building"), and is located in an R3 General Residence District.
3. Defendants are the owners of the subject property.
4. The City alleges in its complaint that beginning on or about April 17, 2003, Defendants maintained two dwelling units, one in the basement and one in the attic, in an R3 Single-Family Residence District in violation of the Municipal Code of Chicago Sections 17-7.3-2 (2002).
5. Defendant admit to these allegations and agrees to plead liable to Counts I and II of the City's complaint. Defendant also agrees to pay the City a fine in the amount of \$200, and reimburse the City of its litigation costs in the amount of \$123.50. Payment of the \$323.50 shall be made by a certified check or money order payable to the "City of Chicago," and hand delivered or mailed to Tina Zverina at 30 North LaSalle Street, Suite 700, Chicago, Illinois, no later than August 11, 2004.
6. Defendants, along with their successors, heirs, assignees, agents, and/or other person(s) working in concert with them or under their control, shall be permanently enjoined from maintaining, arranging, designing, or using more than two dwelling unit at the subject property.
7. The Court shall retain jurisdiction to enforce the terms of this Agreed Order. If a violation of any of this Order's provisions exists, the penalty shall be:
  - a. A fine to the City in the amount of \$200.00 per day of violation; and
  - b. Upon petition by the City, a hearing as to why Defendant or any other party subject to this Order should not be held in contempt of court for violation of this Agreed Order.
8. Pursuant to Illinois Supreme Court Rule 304(a), this is a final and appealable order and the Court finds no just reason for delaying enforcement.
9. This case is taken off the Court's call.

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Agreed to by:

*Lazaro Herrera*  
 Defendant Lazaro Herrera  
 1635 N. Keeler Ave.  
 Chicago, IL 60639  
 (773) 851-6985

*Pascuala Trujillo*  
 Defendant Pascuala Trujillo  
 1635 N. Keeler Ave.  
 Chicago, IL 60639

Attorney for the City of Chicago  
 Mara S. Georges, Corporation Counsel, City of Chicago

By: *Christopher M. Grunewald*  
 Christopher M. Grunewald  
 Building and Land Use Litigation Division  
 30 N. LaSalle Street, Suite 700  
 Chicago, IL 60602  
 (312) 744-6648  
 #90909

ENTERED:

*Ann Houser*  
 Judge

Assoc. Judge ANN HOUSER

JUN 11 2004

Date Circuit Court - 227