

# UNOFFICIAL COPY

Claim of lien instrument pursuant to the Illinois Wrongful Death Act, ( 740 ILCS 180/), pursuant to the Illinois Survival Statute, ( 755 ILCS 5/27-6), pursuant to Probate Case No. 01 P 2989, Illinois Probate Act of 1975, ( 755 ILCS 5/1-2.05), Ch. 110 1/2, par. 1- 2.05, Sec. 1-2.05 "Claim", Lis Pendens, No. 01 L 7039, 05 L 5751, 01-05-2851 Claims No. VS00281 & XN11613



Doc#: 0536408305 Fee: \$40.00 Eugene "Gene" Moore RHSP Fee:\$10.00 Cook County Recorder of Deeds Date: 12/30/2005 03:20 PM Pg: 1 of 9

## CLAIM OF LIEN

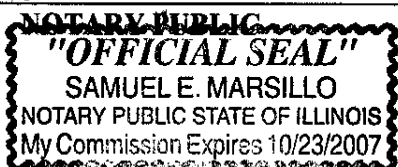
## DONE AT CUSTOMER'S REQUEST

NOTICE IS HEREBY GIVEN THAT on the 30th day of December, 2005, that a "Claim" of "Lien" was executed by : FABIENE D. MCGEE, Independent Administrator of the Estate of JOYCE RICHARDSON, Deceased, & heirs / Beneficiaries, the "lienors" herein ) whose address is : 15820 So. Myrtle Ave, City of Harvey, State of Illinois, 60426, against real properties "owned" by BETHANY HOMES & METHODIST HOSPITAL OF CHICAGO, A CORPORATION, & BETHANY METHODIST CORPORATION, for a unpaid debt / claim for Medical / Professional Liability, Hospital "Fire", Premises / General Liability, and Wrongful-Death , date of loss: April 8, 2001, that occurred at "owners" property located at : 5025 N. Paulina Street, Chicago, Illinois, 60640, a "unpaid" debt / claim in-which prima facie, preponderance proof of loss & damages have been served upon "debtor" and assessed to the "Sum" of ( \$150,000,000.00 ) " ONE - HUNDRED - FIFTY " - "MILLION" - "DOLLARS", plus "interest" of 9 % per year, a "Claim of Lien" against owner's following described real properties located in the County of Cook , State of Illinois , See Attached Exhibit A, B, C,

By: Fabiene D. McGee  
Lienor  
Leslie S. McCarter  
WITNESS

Subscribed and sworn to before me this 30th day of December, 2005

Samuel E. Marsillo



prepared by:  
Leslie S. McCarter

**UNOFFICIAL COPY****EXHIBIT A****LEGAL DESCRIPTION OF LAND**

THE SOUTH 18 FEET OF THE NORTH 38 FEET OF LOT 2; ALSO THAT PART OF LOT 2 (EXCEPT THE NORTH 38 FEET THEREOF) AND LOTS 3, 4, 5 AND 6 (EXCEPT THE SOUTH 4 FEET THEREOF) LYING WEST OF A LINE DRAWN 120 FEET WEST OF AND PARALLEL WITH THE WEST LINE OF NORTH ASHLAND AVENUE AS WIDENED BY ORDINANCE PASSED DECEMBER 8, 1920, IN MILLER'S SUBDIVISION OF LOTS 4, 5 AND 6 IN BLOCK 4 IN ANDERSONVILLE, BEING A SUBDIVISION OF THE NORTHEAST 1/4 OF THE SOUTHEAST 1/4 OF SECTION 7 AND THAT PART OF THE NORTHWEST 1/4 OF THE SOUTHWEST 1/4 LYING WEST OF GREEN BAY ROAD OF SECTION 8, ALL IN TOWNSHIP 40 NORTH, RANGE 14, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

P.I.N. No.: 14-07-415-010  
Common Property Address: 5010 N. Ashland Avenue, Chicago, IL

LOTS 7 THROUGH 12 IN MILLER'S SUBDIVISION OF LOTS 4, 5 AND 6 IN BLOCK 4 IN ANDERSONVILLE, BEING A SUBDIVISION OF THE NORTHEAST 1/4 OF THE SOUTHEAST 1/4 OF SECTION 7 AND THAT PART OF THE NORTHWEST 1/4 OF THE SOUTHWEST 1/4 LYING WEST OF GREEN BAY ROAD OF SECTION 8, ALL IN TOWNSHIP 40 NORTH, RANGE 14, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

P.I.N. No.: 14-07-415-001, 002 & 003  
Common Property Address: 5025 N. Paulina, Chicago, IL

ALL OF THE VACATED 20 FOOT ALLEY LYING WEST OF AND ADJOINING LOTS 1 TO 6, BOTH INCLUSIVE, AND EAST OF AND ADJOINING LOTS 7 TO 12, BOTH INCLUSIVE, (EXCEPT THE EAST 1/2 OF THAT PART OF SAID ALLEY LYING WEST OF AND ADJOINING LOT 1 AND THE NORTH 20 FEET OF LOT 2) IN MILLER'S SUBDIVISION OF LOTS 4, 5 AND 6 IN BLOCK 4 IN ANDERSONVILLE, BEING A SUBDIVISION OF THE NORTHEAST 1/4 OF THE SOUTHEAST 1/4 OF SECTION 7 AND THAT PART OF THE NORTHWEST 1/4 OF THE SOUTHWEST 1/4 OF SECTION 8 LYING WEST OF GREEN BAY ROAD, ALL IN TOWNSHIP 40 NORTH, RANGE 14, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

P.I.N. No.: 14-07-415-010, 001, 002 & 003

LOTS 5, 6 AND THE NORTH 33 1/3 FEET OF LOT 8 IN BLOCK 2 IN THE SUBDIVISION BY GEORGE TAYLOR, TRUSTEE, OF THE NORTH 10 ACRES OF THAT PART OF THE SOUTH 1/2 OF THE SOUTHEAST 1/4 OF SECTION 7 AND OF THE SOUTH 1/2 OF THE SOUTHWEST 1/4 OF SECTION 8, ALL IN TOWNSHIP 40 NORTH, RANGE 14, EAST OF THE THIRD PRINCIPAL MERIDIAN, LYING BETWEEN GREEN BAY ROAD AND THE CHICAGO AND NORTHWESTERN RAILROAD, IN COOK COUNTY, ILLINOIS.

P.I.N. No.: 14-07-415-004, 007 & 008  
Common Property Address: 4901-4917 N. Paulina, Chicago, IL

# UNOFFICIAL COPY

LOTS 1, 2, 3, 4, 5 AND 6 IN THE SUBDIVISION OF LOTS 7 AND 8 IN BLOCK 4 IN ANDERSONVILLE, BEING A SUBDIVISION OF PART OF THE SOUTHEAST 1/4 OF SECTION 7 AND OF PART OF THE SOUTHWEST 1/4 OF SECTION 8, LYING WEST OF GREEN BAY ROAD, ALL IN TOWNSHIP 40 NORTH, RANGE 14, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

P.I.N. No.: 14-07-414-014, 016, 017, 018, 019, 027 & 028 Common  
Property Address: 4918-4922 N. Paulina, Chicago, IL

THE NORTH 25 FEET OF LOT 1 AND ALSO THE PARCEL OF LAND DESCRIBED AS THAT PART OF THE AFORESAID LOT 1, LYING NORTH OF A LINE COMMENCING AT A POINT 92 FEET 10 INCHES WEST OF THE EAST LINE AND 25 FEET SOUTH OF THE NORTH LINE OF SAID LOT, AND THENCE IN A SOUTHWESTERLY DIRECTION A DISTANCE OF 10 FEET 6 INCHES TO A POINT 29 FEET 5 1/4 INCHES SOUTH OF THE NORTH LINE OF SAID LOT, AND THENCE WESTERLY ON A LINE PARALLEL TO THE NORTH LINE OF SAID LOT TO THE WEST LINE OF SAID LOT, IN BLOCK 3 IN THE SUBDIVISION BY GEORGE TAYLOR, TRUSTEE, OF THE NORTH 10 ACRES OF THE SOUTH 1/2 OF THE SOUTHEAST 1/4 OF SECTION 7, AND OF THE SOUTH 1/2 OF THE SOUTHWEST 1/4 OF SECTION 8, ALL IN TOWNSHIP 40 NORTH, RANGE 14, EAST OF THE THIRD PRINCIPAL MERIDIAN, LYING BETWEEN GREEN BAY ROAD AND THE CHICAGO AND NORTHWESTERN RAILROAD;

P.I.N. No.: 14-07-414-020  
Common Property Address: 4918-4922 N. Paulina, Chicago, IL

LOTS 7, 8, 9 AND 10 (EXCEPT THAT PART TAKEN FOR WIDENING OF NORTH ASHLAND AVENUE) AND LOTS 11, 12, 13, 15, 16, 17, 18 AND 19 IN JOHN REITER'S SUBDIVISION OF LOTS 4, 5 AND 6 (EXCEPT THE EAST 33 FEET OF SAID LOT 4) ALL IN BLOCK 3 IN ANDERSONVILLE, BEING A SUBDIVISION OF THE NORTHEAST 1/4 OF THE SOUTHEAST 1/4 OF SECTION 7 AND SO MUCH OF THE NORTHWEST 1/4 OF THE SOUTHWEST 1/4 OF SECTION 8 AS LIES WEST OF GREEN BAY ROAD, ALL IN TOWNSHIP 40 NORTH, RANGE 14, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

P.I.N. No.: 14-07-409-079, 080, 081, 073, 072, 070, 069, 068, 067 & 066  
Common Property Address: 5050 N. Ashland, Chicago, IL

THE EAST 6 FEET OF LOT 6 AND ALL OF LOTS 7 AND 8 IN THE SUBDIVISION OF LOT 7 IN BLOCK 3 IN ANDERSONVILLE, BEING A SUBDIVISION IN THE EAST 1/2 OF THE SOUTHEAST 1/4 OF SECTION 7 AND OF PART OF THE SOUTHWEST 1/4 OF SECTION 8, ALL IN TOWNSHIP 40 NORTH, RANGE 14 EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

P.I.N. No.: 14-07-409-065  
Common Property Address: 1614 W. Winnemac, Chicago, IL

# UNOFFICIAL COPY

**THAT PART OF LOT 5 LYING WITHIN THE NORTHWEST 1/4 OF SECTION 19 AND LYING WESTERLY OF THE EASTERLY LINE OF CARDWELL ROAD IN WHITE'S SUBDIVISION OF THE WEST 1/2 OF THE NORTHEAST 1/4 AND PART OF THE NORTHWEST 1/4 OF SECTION 19, TOWNSHIP 41 NORTH, RANGE 13 EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.**

**P. I. N. No. : 10-19-120-002-0000**

**Common Property Address : 8425 Waukegan Road, Morton Grove, IL**

**LOTS 4, 5, 6, 7, 8, 9 AND 10 BLOCK 3 AND LOTS 1, 2, 3, 4 AND 5 IN BLOCK 4 IN MAIN STREET AND WAUKEGAN ROAD SUBDIVISION, BEING A SUBDIVISION OF THE NORTH 1/2 OF THE SOUTHWEST 1/4 OF SECTION 19, TOWNSHIP 41 NORTH, RANGE 13 EAST OF THE THIRD PRINCIPAL MERIDIAN, LYING EAST OF THE CENTER LINE OF TELEGRAPH ROAD AND EAST OF THE CENTER LINE OF WAUKEGAN ROAD, ACCORDING TO THE PLAT THEREOF RECORDED AS DOCUMENT NUMBER 9206201, IN COOK COUNTY, ILLINOIS.**

**P. I. N. No. : 10-19-303-001, 002, 003, 004, 005, 006, 007 &  
10-19-302-025, 027, 028, 029, & 030**

**Common Property Address : The Southeast and Southwest corners of  
Main Street and Newland, Niles, IL**

**P. I. N. No. : 14-07-415-006-0000**

**Common Property Address : 4911 N. Paulina Street, Chicago, IL**

**LOT 7 (EXCEPT THE NORTH 16.14 FEET) IN BLOCK 2 IN TAYLOR'S SUBDIVISION OF THE NORTH 10 ACRES OF THAT PART OF THE SOUTH 1/2 OF THE SOUTHEAST 1/4 OF SECTION 7 AND THE SOUTH 1/2 OF THE SOUTHWEST 1/4 OF SECTION 8, TOWNSHIP 40 NORTH, RANGE 14, EAST OF THE THIRD PRINCIPAL MERIDIAN, LYING BETWEEN GREEN BAY ROAD AND THE CHICAGO AND NORTHWESTERN RAILROAD, IN COOK COUNTY, ILLINOIS.**

**P. I. N. No. : 14-07-409-076-0000**

**Common Property Address : 5054 N. Ashland Ave, Chicago, IL**

**LOT 3 (EXCEPT THAT PART THEREOF LYING EAST OF A LINE DRAWN THROUGH A POINT IN THE NORTH LINE OF LOT 1, 48.02 FEET WEST OF THE EAST LINE OF SECTION 7 HEREINAFTER DESCRIBED AND THROUGH A POINT IN THE SOUTH LINE OF LOT 10, 50 FEET WEST OF THE EAST LINE OF SECTION 7 AS CONVEYED TO THE CITY OF CHICAGO BY DEED DATED SEPTEMBER 27, 1924 AND RECORDED APRIL 2, 1926 AS DOCUMENT NUMBER 9225132) IN THE SUBDIVISION OF LOTS 4, 5, AND 6 (EXCEPT THE EAST 33 FEET OF SAID LOT 4) IN BLOCK 3 IN ANDERSONVILLE, SAID ANDERSONVILLE BEING A SUBDIVISION BY ANDREW J. BROWN OF THE NORTHEAST 1/4 OF THE SOUTHEAST 1/4 OF SECTION 7, AND SO MUCH OF THE NORTHWEST 1/4 OF THE SOUTHWEST 1/4 AS LIES WEST OF GREEN BAY ROAD OF SECTION 8, TOWNSHIP 40 NORTH, RANGE 14, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS**

**UNOFFICIAL COPY**

**P. I. N. No. : 04-27-302-004-0000**

**Common Property Address : 2601 Chestnut Ave. Glenview, IL**

**THAT PART OF LOTS 22 AND 23 IN GLENVIEW NAVAL AIR STATION SUBDIVISION NUMBER 2, BEING A PART OF SECTIONS 15, 21, 22, 23, 26, 27, 28 AND 34, TOWNSHIP 42 NORTH, RANGE 12 EAST OF THE THIRD PRINCIPAL MERIDIAN, ACCORDING TO THE PLAT THEREOF RECORDED MARCH 31, 1999 AS DOCUMENT 99313067, DESCRIBED AS FOLLOWS :**

**COMMENCING AT THE NORTHWEST CORNER OF LOT 22 AFORESAID; THENCE NORTHEASTERLY ALONG THE NORTHERLY LINE OF LOT 22 AFORESAID BEING A CURVED LINE CONVEY SOUTHERLY AND HAVING A RADIUS OF 530.0 FEET FOR A DISTANCE OF 73.70 FEET (THE CHORD OF SAID ARC HAVING A BEARING OF NORTH 85 DEGREES, 20 MINUTES, 03 SECONDS EAST A DISTANCE OF 73.64 FEET) TO THE POINT OF BEGINNING; THENCE NORTH EASTERLY ALONG SAID NORTH EASTERLY LINE BEING A CURVED LINE CONVEX SOUTHERLY AND HAVING A RADIUS OF 530.0 FEET FOR A DISTANCE OF 129.88 FEET (THE CHORD OF SAID ARC HAVING A BEARING OF NORTH 74 DEGREES, 19 MINUTES, 49 SECONDS EAST A DISTANCE OF 129.55 FEET); THENCE NORTH 67 DEGREES, 18 MINUTES, 36 SECONDS EAST ALONG SAID NORTHERLY LINE 106.78 FEET; THENCE SOUTH 67 DEGREES, 18 MINUTES, 36 SECONDS EAST 251.00 FEET; THENCE SOUTH 67 DEGREES, 41 MINUTES, 19 SECONDS EAST ALONG A NORTH EASTERLY LINE 28.49 FEET TO A POINT OF THE EASTERLY LINE OF SAID LOT 22; THENCE SOUTH 22 DEGREES, 4 MINUTES, 24 SECONDS EAST ALONG AN EAST LINE OF LOT 22 AFORESAID 172.01 FEET TO A POINT OF CURVE; THENCE SOUTHERLY ALONG A RADIUS OF 454.35 FEET FOR A DISTANCE OF 164.13 FEET (THE CHORD OF SAID ARC HAVING A BEARING OF SOUTH 12 DEGREES, 14 MINUTES, 39 SECONDS EAST A DISTANCE OF 163.24 FEET TO THE SOUTHEAST CORNER OF LOT 22; THENCE SOUTH 00 DEGREES, 41 MINUTES, 18 SECONDS WEST ALONG THE EAST LINE OF LOT 23 FOR A DISTANCE OF 227.37 FEET; THENCE NORTH 50 DEGREES, 00 MINUTES, 00 SECONDS WEST 683.92 FEET; THENCE NORTH 00 DEGREES, 00 MINUTES, 00 SECONDS EAST 353.30 FEET TO THE POINT OF BEGINNING IN COOK COUNTY, ILLINOIS.**

**P. I. N. No. : 14 - 07- 409- 077- 0000**

**Common Property Address: 5052 N. Ashland Ave., Chicago, IL**

**LOT 4 ( EXCEPT THAT PART CONVEYED TO THE CITY OF CHICAGO FOR THE WIDENING OF ASHLAND AVENUE ) IN THE SUBDIVISION OF LOTS 4, 5, AND 6 ( EXCEPT THE EAST 33 FEET OF SAID LOT 4 ) IN BLOCK 3 IN ANDERSONVILLE, BEING A SUBDIVISION OF THE NORTH EAST 1/4 OF THE SOUTHEAST 1/4 OF SECTION 7 AND SO MUCH OF THE NORTHWEST 1/4 OF THE SOUTHWEST 1/4 OF SECTION 8, AS LIES WEST OF GREEN BAY ROAD IN TOWNSHIP 40, RANGE 14, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS**

CHICAGO FIRE INCIDENT REPORTING SYSTEM

UNOFFICIAL COPY

Fill in this report in your own words

**A** 10 FID: BITIN09 INCIDENT NO. EXP. MO. DAY YEAR: 04 21 8 91 DAY OF WEEK: Monday

**B** SITUATION FOUND: 11 Structure fire, 13 Vehicle Fire, 14 Brush, grass, leaves, 15 Trash, Rubbish, 16 Explosion, No after fire, 17 Outside spill with fire, 19 Other fires not classified. 29 Overpressure Rupture, 32 Emergency Medical call, 33 Locked-in trapped, 34 Search, 35 Extrication, 39 Rescue-Not classified, 41 Spill, leak-No fire. 44 Power line down, 45 Arcing electric equipment, 46 Aircraft standby, 47 Chemical spill, 49 Hazardous condition, 52 Water removal, 53 Smoke removal. 54 Animal Rescue, 56 Assist Police, 56 Unauthorized burning. 65 Steam, gas mistaken for smoke, 71 Malicious false, 72 Bomb Scare, 73 Alarm Malfunction, 74 Unintentional false, 99 Unclassified.

**C** ACTION TAKEN: 1 Extinguishment, 2 Rescue or Assistance, 3 Investigation only, 4 Remove Hazard. 5 Stand by, 6 Salvage, 7 Ambulance. 9 Not classified, 0 Undetermined. 3 OUT ON ARRIVAL

**D** FIXED PROPERTY USE (Occupancy): 3311 IGNITION FACTOR: 1311

**E** CORRECT ADDRESS (Up to maximum of 21 characters): 5025 N Paulina

**F** OCCUPANT NAME (LAST, FIRST, MI): Methodist Hospital of Chicago TELEPHONE: 312 372-2099 ROOM or APT:

**G** OWNER NAME (LAST, FIRST, MI): ADDRESS: TELEPHONE:

**H** METHOD OF ALARM: 1 Telephone direct, 2 Municipal alarm system, 3 Private alarm system. 4 Radio, 5 Verbal, 7 Tie-line (911). 8 Voice signal municipal alarm signal, 9 Not classified above, 0 Undetermined or not reported. Engine Co: 7, Shift: 083, NO. ALARMS: 11

**I** NO. FIRE SERVICE PERSONNEL RESPONDED: 049 NO. ENGINES RESPONDED: 1004 NO. AERIAL APPARATUS RESPONDED: 003 NO. OTHER VEHICLES RESPONDED: 007

**J** NUMBER OF INJURIES: FIRE SERVICE: OTHER: 001 NUMBER OF FATALITIES: FIRE SERVICE: OTHER:

**K** COMPLEX: 1987 MOBILE PROPERTY TYPE: 00

**L** AREA OF FIRE ORIGIN: Hospital room EQUIPMENT INVOLVED IN IGNITION: 98

**M** FORM OF HEAT IGNITION: 45S TYPE OF MATERIAL IGNITED: 21 FORM OF MATERIAL IGNITED: hospital gown 34

**N** METHOD OF EXTINGUISHMENT: Self extinguished. 2 Make shift aids, 3 Portable extinguisher, 4 Automatic ext. system. 5 Pre-connect for trunk only, 6 Pre-connect h. self hydrant draft standpipe, 7 Hand-laid hose/draft standpipe. 8 Master stream device, 9 Not classified above, 0 Undetermined or not reported. 2

**O** LEVEL OF FIRE ORIGIN: 1 Grade level to 9 ft., 2 10 to 19 feet, 3 20 to 29 feet, 4 30 to 49 feet, 5 50 to 70 feet. 6 Over 70 feet, 7 Objects in flight, 8 Below ground level, 9 Not classified above, 0 Under mined. 4 ESTIMATED TOTAL DOLLAR LOSS: NIRS 1 LAYOUT 4

**P** NUMBER OF STORIES: 1 1 story, 2 2 story, 3 3 to 4 stories, 4 5 to 6 stories, 5 7 to 12 stories, 6 13 to 24 stories, 7 25 to 49 stories, 8 50 stories or more, 9 Number of Stories undetermined or not reported. CONSTRUCTION TYPE: 1 Fire resistive, 2 Heavy timber, 3 Protected noncombustible, 4 Unprotected noncombustible, 5 Protected ordinary, 6 Unprotected ordinary, 7 Protected wood frame, 8 Unprotected wood frame, 9 Not classified above, 0 Undetermined or not reported.

**Q** EXTENT OF DAMAGE: 1 Confined to the object of origin, 2 Confined to part of room or area of origin, 3 Confined to room of origin, 4 Confined to the fire-rated comp. of origin, 5 Confined to floor of origin, 6 Confined to structure of origin, 7 Extended beyond structure of origin, 9 No damage of this type (N/A). Flame: 1, 2, 3, 4, 5, 6, 7. Smoke: 1, 2, 3, 4, 5, 6, 7. DETECTOR PERFORMANCE: 1 Det. in room or space of fire origin - oper., 2 Det. not in rm. or space of fire origin - oper., 3 Det. in rm. or space of origin - no oper., 4 Det. not in rm. or space of origin - no oper., 5 Det. not in rm. or space of fire origin, but fire too small to oper., 9 Not classified above, 0 Undetermined or not reported, 8 No detectors present (N/A). SPRINKLER PERFORMANCE: 1 Equipment or draft, 2 Equipment should have operated - did not, 3 Equipment present but too small to oper., 9 Not classified above, 0 Undetermined or not reported, 8 No equipment present (N/A).

**R** TYPE OF MATERIAL GENERATING MOST SMOKE: IF SMOKE SPREAD BEYOND ROOM OF ORIGIN: FORM OF MATERIAL GENERATING MOST SMOKE: 120# 6119169 Beat 2032 officer Joyce Star 12549

**S** 30 IF MOBILE PROPERTY: YEAR, MAKE, MODEL, SERIAL NO., LICENSE NO.

**T** 40 IF EQUIPMENT INVOLVED IN IGNITION: YEAR, MAKE, MODEL, SERIAL NO.

**U** MEMBER MAKING REPORT: BC [Signature] DATE: 4/8/01

COMPLETE FOR ALL INCIDENTS

COMPLETE FOR ALL FIRES

COMPLETE IF STRUCTURE FIRE

Exhibit A

**UNOFFICIAL COPY**

ST. PAUL MERCURY INSURANCE COMPANY  
 The St Paul Travelers Companies  
 215 Shuman Blvd., Suite 201  
 Naperville, IL 60563  
 Telephone: (630) 961-7179  
 Fax: (877) 795-9975

**Certified Mail – Return Receipt Requested**  
**7004 2510 0007 5290 7535**

**and US Mail**

April 22, 2005

Fabiene D. McGee  
 15820 So. Myrtle Ave.  
 Harvey, IL. 60426

**RE:      Tracking Number:**      XN11613  
**Claimant:**                    Joyce Richardson  
**Insured:**                        Bethany Methodist Corp  
**Claim No.:**                    FK07200380 09T001  
**Date of Loss:**                April 8, 2001

Dear Ms McGee:

We acknowledge receipt of your package that was shipped on April 20, 2005, via Federal Express, and addressed to James Wucherpfenning. We are also in receipt of your settlement demand where you have asked St. Paul Mercury Insurance Company to tender payment for claim #XN11613 in the amount of \$23,000,000.00 (Twenty-Three Million) pursuant to general liability policy # FK07200380 09T001.

Please be advised that our settlement position has not changed. As we have stated in our earlier correspondence, there is no coverage under Policy #FK07200380 09T001 for your claim. Policy #FK07200380 09T001 was a general liability policy issued to Bethany Methodist Corporation for a specific premises located at 2601 Chestnut Avenue, Glenview, Illinois. Your claim is based upon a fire that occurred on April 8, 2001 at the insured's hospital located on Paulina Street in Chicago. Since the fire did not occur at the covered premises located in Glenview, Illinois, this policy would not apply to your loss. Accordingly, St. Paul respectfully denies your claim and demand for settlement.

Sincerely,

Tracie Luberda  
 Technical Specialist, Liability

*Exhibit B*

**UNOFFICIAL COPY**

ST. PAUL FIRE AND MARINE  
INSURANCE COMPANY  
Suite 400, MC MMDF  
540 Lake Cook Road  
Deerfield, IL 60015  
Telephone: (847) 374-2395  
Fax: (847) 374-0839

December 9, 2004

Ms. Fabiene D. McGee  
15820 South Myrtle Avenue  
Harvey, IL 60425

**RE: Tracking No.:** VS00981  
**Claimant:** Joyce Richardson  
**Insured:** Bethany Methodist Corp  
**Claim No.:** 0566XM2205 12A001  
**Date of Loss:** April 8, 2001

Dear Ms. McGee:

This correspondence will serve as our response to your letter dated December 1, 2004, which contained a "SETTLEMENT DEMAND" to St. Paul to "'TENDER' their 'SELF INSURED TRUST', 'BASIC' INSURANCE, and to 'TENDER' their 'UMBRELLA' 'EXCESS LIABILITY PROTECTION COVERAGE', 'WITH-IN' The 'POLICY LIMITS...'"

We acknowledge receipt of your package of materials sent on or about November 9, 2004. Please be advised that our settlement position was made after the receipt of those materials. We have responded to your earlier settlement demands and our response remains the same. St. Paul respectfully declines to make an offer in response to your demand to St. Paul at this time since the primary layer of coverage for Bethany Hospital, the self insured trust, has not been exhausted. We are sending your demand letter dated December 1, 2004, to Bethany Hospital for the hospital's consideration, along with a copy of the package of materials you previously sent on or about November 9, 2005, and the supplemental materials sent on or about November 16, 2004.

Finally, in light of the tenor of the two phone messages that you left for me recently, I ask that if you wish to communicate with me in the future, please do so in writing.

Sincerely,

ST. PAUL FIRE AND MARINE INSURANCE COMPANY  
Martha A. Pagliari  
Senior Claim Specialist  
MARTHA.PAGLIARI@STPAUL.COM

cc: Robert W. Karr, Esq.  
Paul Otubsin, Esq.



UNOFFICIAL COPY

ORIGINAL

LETTERS OF OFFICE - DECEDENT'S ESTATE

(Rev. 9-99 CCP-415)(PC.- Gen.)

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
County Department, Probate Division

Estate of

JOYCE RICHARDSON

No. 2001 P 2989

Docket 79

Page 449

Deceased

LETTERS OF OFFICE - DECEDENT'S ESTATE

FABIENE D. MCGEE

has been appointed

Independent

Administrator

of the estate of

JOYCE RICHARDSON

, deceased,

who died April 08, 2001

, and is authorized to take possession of and collect the estate

the decedent and to do all acts required by law.



Witness, May 14, 2001

Dorothy Brown  
Clerk of Court

CERTIFICATE

I certify that this is a copy of the letters of office now in force in the estate.

Witness, May 14, 2001

*Dorothy Brown*  
Clerk of Court

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

Exhibit D