

# UNOFFICIAL COPY



Doc#: 0909135012 Fee: \$40.00  
Eugene "Gene" Moore RHSP Fee:\$10.00  
Cook County Recorder of Deeds  
Date: 04/01/2009 09:09 AM Pg: 1 of 3

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**Above space for Recorder's Use Only**

Cook County #21762

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

CitiMortgage, Inc. successor by merger to ABN AMRO  
Mortgage Group, Inc.

PLAINTIFF

Vs.

Daniel L. Fitzgerald; Daniel E. Tinoco; National City  
Bank; Unknown Owners and Nonrecord Claimants

DEFENDANTS

No. 09 CH

09 CH 13235

## LIS PENDENS AND NOTICE OF FORECLOSURE

I, the undersigned, do hereby certify that the above-entitled cause was filed in the above Court on the \_\_\_\_\_ day of MAR 25 2009, 20\_\_, for Foreclosure and is now pending in said Court and that the property affected by said cause is described as follows:

- (i) The names of all Plaintiffs, Defendants and case number are set forth above.
- (ii) The court in which the action was brought is set forth above.
- (iii) The names of the title-holders of record are as follows:  
Daniel L. Fitzgerald  
Daniel E. Tinoco
- (iv) The legal description is:

THE NORTH 30 FEET OF THE SOUTH 60 FEET OF LOT 15 IN BLOCK 1 IN JOSEPH L.  
DONAT'S ADDITION TO BERWYN, BEING A SUBDIVISION OF THE SOUTHEAST 1/4 OF

**Excel Innovations and Amicus Professional Legal Service Inc.**

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THE NORTHEAST 1/4 OF SECTION 30, TOWNSHIP 39 NORTH, RANGE 13 EAST OF THE THIRD PRINCIPAL MERIDIAN, (EXCEPT THE WEST 295.16 FEET THEREOF) IN COOK COUNTY, ILLINOIS.

**TAX PARCEL NUMBER:** 16-30-231-008

(v) The common address or location of the property is:

2519 S. Elmwood Avenue  
Berwyn, IL 60402

(vi) Identification of the mortgage sought to be foreclosed:

a) Mortgagors:

Daniel L. Fitzgerald  
Daniel E. Tinoco

b) Mortgagee:

Lincoln Mortgage and Funding Corporation

c) Date of mortgage: 3/30/2007

d) Date and place of recording:

4/6/2007

Office of the Recorder of Deeds of Cook County Illinois

e) Document Number: 0709640141

SIGNATURE: \_\_\_\_\_

Attorney of Record

Louis Joseph Manetti Jr.  
ARDC #6293288

**THIS DOCUMENT WAS PREPARED BY:**

**MAIL TO: BOX 70**

MAIL TO: CODILIS & ASSOCIATES, P.C.  
Attorneys for Plaintiff  
15W030 North Frontage Road, Suite 100  
Burr Ridge, IL 60527  
(630) 794-5300  
14-09-09339

**NOTE: Pursuant to the Fair Debt Collection Practices Act you are advised that this law firm is deemed to be a debt collector attempting to collect a debt and any information obtained will be used for that purpose.**

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COUNTY DEPARTMENT - CHANCERY DIVISION

CitiMortgage, Inc. successor by merger to  
ABN AMRO Mortgage Group, Inc.

PLAINTIFF

v.

Daniel L. Fitzgerald; et. al.

DEFENDANT

Case No. 09 CH 13235

## NOTICE OF FILING PURSUANT TO PREDATORY LENDING DATABASE ACT

TO: Illinois Department of Financial and Professional Regulation  
Division of Banking  
122 S. Michigan Avenue, 19<sup>th</sup> Floor, Chicago, IL 60603  
**Attn: Anti Predatory Lending Database (APLD)**

**PLEASE TAKE NOTICE** that on 03/24/2009, we have caused the attached Lis Pendens to be sent for recording with the Cook County Recorder, Illinois.

Codilis & Associates, P.C.

By: \_\_\_\_\_

Codilis & Associates, P.C.  
Attorneys for Plaintiff  
15W030 North Frontage Road, Suite 100  
Burr Ridge, IL 60527  
Attorney Number: #21762  
Cook #21762  
**14-09-09339**

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### PROOF OF SERVICE

I, the undersigned, a non-attorney, certify that a copy of this notice was served by hand delivery to the above-entitled address on \_\_\_\_\_.

By: \_\_\_\_\_