



Doc#: 1104922042 Fee: \$40.00  
Eugene "Gene" Moore RHSP Fee:\$10.00  
Cook County Recorder of Deeds  
Date: 02/18/2011 10:27 AM Pg: 1 of 3

IN THE CIRCUIT COURT OF COOK COUNTY JUDICIAL CIRCUIT  
CHICAGO, ILLINOIS

JPMORGAN CHASE BANK, NATIONAL ASSOCIATION, )  
Plaintiff, )  
vs. )

Case No. 11-CH- 6172

RENATA LIETKIENE aka RENATA LIUTKIENE, GREEN )  
OAKS CONDOMINIUM ASSOCIATION and JPMORGAN )  
CHASE BANK, NATIONAL ASSOCIATION, )  
Defendants. )

**NOTICE OF FORECLOSURE (LIS PENDENS)**  
**(735 ILCS 5/15-1503)**

The undersigned certifies that the above entitled mortgage foreclosure action was filed on Feb 18, 2011 and is now pending.

- i. The names of all plaintiffs and the case number are identified above.
- ii. The court in which said action was brought is identified above.
- iii. The names of the title holders of record are: Renata Liutkiene.
- iv. A legal description of the real estate sufficient to identify it with reasonable certainty is as follows:

Unit 34-109 in Green Oaks Condominium, as delineated on a Plat of Survey of the following described tract of land:

Parcel 1:

The East 1/2 of the Southwest 1/4 of Section 11, Township 37 North, Range 12 East of the Third Principal Meridian, (except that part lying South of the following described line: beginning at a point on the West line of said East 1/2 of said Southwest 1/4, said point being 12.50 feet North of the North line of the South 1/2 of said East 1/2 of said Southwest 1/4; thence Easterly on a line 12.50 feet North of and parallel with said North line of said South 1/2 of said East 1/2 of said Southwest 1/4, 225.79 feet to a point of curvature; thence

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Southeasterly, 87.31 feet along a curved line convex to the Northeast having a radius of 72.50 feet to a point; thence Southeasterly at an angle of 69 degrees, as measured from East to Southeast from said North line of said South  $\frac{1}{2}$  of the said East  $\frac{1}{2}$  of the said Southwest  $\frac{1}{4}$ , 118.31 feet to a point of curvature; thence Southeasterly, 81.29 feet along a curved line convex to the Southwest having a radius of 67.50 feet to a point; thence Easterly on a line 187.50 feet South of and parallel with said North line of said South  $\frac{1}{2}$  of said East  $\frac{1}{2}$  of said Southwest  $\frac{1}{4}$ , 51.62 feet to a point of curvature; thence Northeasterly, 192.77 feet along a curved line convex to the Southeast having a radius of 117.50 feet to a point; thence Northwesterly at an angle of 86 degrees, as measured from East to Southeast from said North line of said South  $\frac{1}{2}$  of said East  $\frac{1}{2}$  of said Southwest  $\frac{1}{4}$ , 99.79 feet to a point; thence Northeasterly to an angle of 24 degrees, 18 minutes, 21 seconds, as measured from East to Northeast from said North line of said South  $\frac{1}{2}$  of said East  $\frac{1}{2}$  of said Southwest  $\frac{1}{4}$ , 736.91 feet to a point; thence Easterly, at right angles to the East line of said Southwest  $\frac{1}{4}$ , 84.68 feet to a point on the East line of said Southwest  $\frac{1}{4}$ , said point being 341.28 feet North of the North line of the South  $\frac{1}{2}$  of said East  $\frac{1}{2}$  of the Southwest  $\frac{1}{4}$  of Section 11)

And also (except that part lying West of the following described line: Beginning at a point on the North line of said  $\frac{1}{2}$  of said Southwest  $\frac{1}{4}$ , said point being 847.38 feet East of the West line of said East  $\frac{1}{2}$  of said Southwest  $\frac{1}{4}$ ; thence Southerly at right angles from said North line of said East  $\frac{1}{2}$  of said Southwest  $\frac{1}{4}$ , a distance of 40 feet; thence Southerly at an angle of 77 degrees 35 minutes 26 seconds as measured from East to Southeast from a line drawn parallel with said North line of said East  $\frac{1}{2}$  of said Southwest  $\frac{1}{4}$  a distance of 172.21 feet to a point of curvature; thence Southerly 169.09 feet along a curved line convex to the East having a radius of 800 feet to a point; thence Southerly at an angle of 89 degrees 42 minutes 04 seconds as measured from East to South from a line drawn parallel with said North line of said East  $\frac{1}{2}$  of said Southwest  $\frac{1}{4}$ , a distance of 480.05 feet to a point of curvature; thence Southerly 101.91 feet along a curved line convex to the West having a radius of 417.25 feet to a point; thence Southerly at an angle of 75 degrees 42 minutes 25 seconds as measured from East to Southeast from a line drawn parallel with said North line of said East  $\frac{1}{2}$  of said Southwest  $\frac{1}{4}$  a distance of 159.78 feet to the aforesaid described line forming an angle of 24 degrees 18 minutes 21 seconds as measured from East to Northeast from the North line of the South  $\frac{1}{2}$  of said East  $\frac{1}{2}$  of said Southwest  $\frac{1}{4}$ ) excepting therefrom said tract of land, the North 40 feet thereof and the East 40 feet thereof (except the North 40 feet) heretofore dedicated, all in Township 37 North, Range 12 East of the Third Principal Meridian, in Cook County, Illinois.

Parcel 2:

Easements for the benefit of Parcel 1 set forth in the Declaration by Miles L. Colena, Paul P. Swett, Jr. and Arthur W. Vine as Trustee and Marquette National Bank, as Trustee

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under Trust 369 recorded June 24, 1970 as Document 211192785 which Plat of Survey is attached as Exhibit "C" to the Declaration of Condominium recorded April 20, 2004 as Document 0411118002 together with its undivided percentage interest in the common elements.

**Parcel 3:**

Easements for the benefit of Parcel 1 set forth in Declaration by American National Bank and Trust Company of Chicago as Trustee under Trust Agreement dated December 21, 1976 and known as Trust Number 39811 recorded February 14, 1980 as Document 25362209.

Permanent Index Number: 23-11-301-006-1125

- v. A common address or description of the location of the real estate is as follows:  
9954 S. 84th Terrace, Unit 109, Palos Hills, IL 60465.
- vi. An identification of the mortgage sought to be foreclosed is as follows:

Names of Mortgagors: Renata Lietkiene.

Name of Mortgagee: Washington Mutual Bank, FA.

Date of Mortgage: July 2, 2004

Date of recording: July 27, 2004

County where recorded: Cook County

Recording document identification: Document No. 0420933196.

Dated this 17th day of February, 2011

Signature   
Attorney for Plaintiff

Address: 111 East Main Street, Suite 200 - P.O. Box 740 - Decatur, IL 62525

XX Attorney of Record  Party to said cause  
(check one)

This document was prepared by: Heavner, Scott, Beyers & Mihlar, LLC

Whose address is: P.O. Box 740

Decatur, Illinois 62525

MAIL TO: Heavner, Scott, Beyers & Mihlar, LLC

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Decatur, Illinois 62525

NO CHANGE IN TAXES