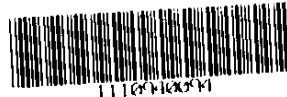


# UNOFFICIAL COPY



Doc#: 1110940094 Fee: \$42.00  
Eugene "Gene" Moore RHSP Fee: \$10.00  
Cook County Recorder of Deeds  
Date: 04/19/2011 02:44 PM Pg: 1 of 4

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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.

No. 11 CH

012304

Dorethea M. Simone; Scenic Tree Condominium  
Association; Bank of America, NA successor by merger  
to LaSalle Bank Midwest National Association;  
Unknown Owners and Nonrecord Claimants

DEFENDANTS

## 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 31 2011, 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:  
Dorethea M. Simone
- (iv) The legal description is:

# UNOFFICIAL COPY

UNIT NUMBER (S) 208 IN BUILDING 10 IN SCENIC TREE CONDOMINIUMS, AS DELINEATED ON A PLAT OF SURVEY OF THE FOLLOWING DESCRIBED TRACT OF LAND:

THAT PART OF THE EAST 1/2 OF THE SOUTHWEST 1/4 OF SECTION 11, TOWNSHIP 37 NORTH, RANGE 12 EAST OF THE THIRD PRINCIPAL MERIDIAN, 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 SOUTH 89 DEGREES 51 MINUTES 54 SECONDS 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 SOUTHEASTERLY ALONG A CURVED LIEN CONVEX TO THE NORTHEAST HAVING A RADIUS OF 72.50 FEET, A CHORD BEARING OF SOUTH 55 DEGREES 21 MINUTES AND 54 SECONDS EAST AND A CHORD DIMENSION OF 82.13 FEET, AN ARC DISTANCE OF 87.31 FEET TO A POINT; THENCE SOUTH 20 DEGREES 51 MINUTES AND 54 SECONDS EAST AT AN ANGLE OF 69 DEGREES AS MEASURED FROM EAST TO SOUTHEAST FROM THE SAID NORTH LINE OF SAID SOUTH 1/2 OF SAID EAST 1/2 OF SAID SOUTHWEST 1/4, 118.31 FEET TO A POINT OF CURVATURE; THENCE SOUTHEASTERLY ALONG A CURVED LIEN CONVEX TO THE SOUTHWEST HAVING A RADIUS OF 67.50 FEET, A CHORD BEARING OF SOUTH 55 DEGREES 21 MINUTES AND 54 SECONDS EAST AND A CHORD DIMENSION OF 76.46 FEET, AN ARC DISTANCE OF 81.29 FEET TO A POINT; THENCE SOUTH 89 DEGREES 51 MINUTES AND 54 SECONDS EAST ON A LINE 187.50 FEET SOUTH OF AND PARALLEL WITH SAID NORTH LINE OF SAID SOUTH 1/2 OF SAID EAST 1/2 OF SAID SOUTHWEST 1/4, 51.62 FEET TO A POINT OF CURVATURE; THENCE NORTHEASTERLY ALONG A CURVED LINE CONVEX TO THE SOUTHEAST HAVING A RADIUS OF 117.50 FEET, A CHORD BEARING OF NORTH 43 DEGREES 08 MINUTES AND 06 SECONDS EAST AND A CHORD DIMENSION OF 171.87 FEET, AN ARC DISTANCE OF 192.77 FEET TO A POINT; THENCE NORTH 03 DEGREES 51 MINUTES AND 54 SECONDS WEST AT AN ANGLE OF 86 DEGREES AS MEASURED FROM EAST TO SOUTHEAST FROM SAID NORTH LINE OF SAID SOUTH 1/2 OF SAID EAST 1/2 OF SAID SOUTHWEST 1/4, 99.79 FEET TO A POINT; THENCE NORTH 65 DEGREES 48 MINUTES AND 19 SECONDS EAST AT AN ANGLE OF 24 DEGREES, 18 MINUTES, 21 SECONDS AS MEASURED FROM EAST TO NORTHEAST FROM SAID NORTH LINE OF SAID SOUTH 1/2 OF SAID SOUTHWEST 1/4 736.91 FEET (MEASURED 736.88 FEET) TO A POINT; THENCE EASTERLY AT RIGHT ANGLES TO THE EAST LINE OF SAID SOUTHWEST 1/4 84.68 FEET TO A POINT ON EAST LINE OF SAID SOUTHWEST 1/4, SAID POINT BEING 341.28 FEET NORTH OF THE NORTH LINE OF THE SOUTH 1/2 OF THE SOUTHWEST 1/4 OF SECTION 11, TOWNSHIP 37 NORTH, RANGE 12 EAST OF THE THIRD PRINCIPAL MERIDIAN, THENCE SOUTH 00 DEGREES 01 MINUTES 08 SECONDS EAST ALONG THE EAST LINE OF THE EAST HALF OF THE SOUTHWEST QUARTER OF SAID SECTION 11, 1167.74 FEET TO THE SOUTH EAST CORNER OF THE SOUTHWEST QUARTER OF SAID SECTION 11; THENCE SOUTH 89 DEGREES 52 MINUTES 20 SECONDS EAST, 1317.14 FEET TO THE SOUTHWEST CORNER OF THE EAST HALF OF THE SOUTHWEST QUARTER OF SAID SECTION 11; THENCE NORTH 00 DEGREES 02 MINUTES 43 SECONDS WEST ALONG THE WEST LINE OF THE EAST HALF OF THE SOUTHWEST CORNER OF SAID SECTION 11, 1339.133 FEET TO THE POINT OF BEGINNING, EXCEPTING FROM SAID TRACT OF LAND THE SOUTH 50.00 FEET

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THEREOF AND THE EAST 40.00 FEET THEREOF (EXCEPT THE SOUTH 50.00 FEET) AND THE WEST 33.00 FEET THEREOF (EXCEPT THE SOUTH 50.00 FEET) HERETOFORE DEDICATED, ALL IN COOK COUNTY, ILLINOIS.

WHICH PLAT OF SURVEY IS ATTACHED AS EXHIBIT "A" TO THE DECLARATION OF CONDOMINIUM RECORDED OCTOBER 24, 2006 AS DOCUMENT NUMBER 0629716058; TOGETHER WITH ITS UNDIVIDED PERCENTAGE INTEREST IN THE COMMON ELEMENTS.

**TAX PARCEL NUMBER:** 23-11-302-003-1268  
(23-11-302-002 underlying)

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

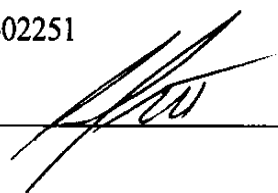
10090 S. 84th Terrace Bldg #10, Unit #208  
Palos Hills, IL 60465

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

- a) Mortgagors:  
Dorethea M. Simone
- b) Mortgagee:  
ABN AMRO Mortgage Group, Inc.
- c) Date of mortgage: 1/10/2007
- d) Date and place of recording:  
01/16/2007  
Office of the Recorder of Deeds of Cook County Illinois
- e) Document Number: 0701602251

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  
14-10-35844

**NOTE: This law firm is deemed to be a debt collector.**

# UNOFFICIAL COPY

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

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

PLAINTIFF

v.

Dorethea M. Simone; et. al.

DEFENDANT

Case No. 11CH012304

## 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 03/31/2011, 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  
14-10-35844

NOTE: This law firm is deemed to be a debt collector.

### 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: \_\_\_\_\_