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LIS PENDENS/ NOTICE OF FORECLOSURE

PREPARED BY & RETURN TO: The Wirbicki Law Group LLC 33 W. Monroe St., Suite 1140 Chicago, IL 60603

Phone: 312-360-9455 Fax: 312-572-7823 1124

Doc#: 1124110027 Fee: \$44.00 Eugene "Gene" Moore RHSP Fee:\$10.00 Cook County Recorder of Deeds Date: 08/29/2011 12:10 PM Pg: 1 of 5

"THIS IS AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE"

W11-2241 42463

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

Wells Fargo Bank, N.A., as Truste: for the Certificateholders Park Place Securities, Inc., Asset-Backed Pass-Through Certificates Series 2004-WCW1

Plaintiff,

VS.

James M. Kardelis a/k/a James Kardelis; Catherine Kardelis; Quadrangle House Condominium Association; Barbara Kardelis; Citibank, National Association as s/i/i to Citibank (South Dakota), N.A.; FIA Card Services, National Association f/k/a Bank of America, N.A.; Target National Bank; Unknown Heirs and Legatees of James M. Kardelis, if any; Unknown Heirs and Legatees of Catherine Kardelis, if any;; Unknown Owners and Non Record Claimants; Defendants.

Case No.

11-CH- 30230

6700 South Shore Drive, Unit 23C, Chicago, IL 60649

NOTICE OF FORECLOSURE

I, the undersigned, do hereby certify that the above entitled cause was filed in the above Court on the day of August, 2011, for Foreclosure of a Mortgage and that the property affected by said cause is described as follows:



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PARCEL 1:

UNIT NUMBER 23C IN QUADRANGLE CONDOMINIUMS AS DELINEATED AND DEFINED ON THE PLAT OF SURVEY OF THE FOLLOWING DESCRIBED PARCEL OF REAL ESTATE:

LOT 1 (EXCEPT THAT PART THEREOF DESCRIBED AS FOLLOWS: COMMENCING AT THE SOUTH EAST CORNER OF SAID LOT 1; THENCE NORTH TO THE NORTH EAST CORNER OF SAID LOT 1; THENCE NORTH TO THE NORTH EAST CORNER OF SAID LOT 1; THENCE WEST ALONG THE NORTH LINE OF SAID LOT 1, 41.1 FEET; THENCE SOUTH EASTERLY ALONG A CURVED LINE, CONVEX TO THE SOUTH WEST WITH A RADIUS OF 96.9 LEET TO THE POINT OF BEGINNING, CONVEYED TO SOUTH PARK COMMISSIONERS FOR STREET AND PARK PURPOSES BY DEEDS RECORDED MARCH 3, 1913 AS DOCUMENT 5137926 AND MARCH 26, 1913 AS DOCUMENT 5151876) AND LOTS 2, 3, 4 AND 5 AND THE NORTH 25 FEET OF LOT 6 IN STUART SUBDIVISION OF THE EAST ONE THIRD OF THAT PART NORTH OF 68TH STREET OF THE NORTH EAST QUARTER OF THE SOUTH EAST QUARTER OF SECTION 24, TOWNSHIP 38 NORTH, RANGE 14, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

WHICH SURVEY IS ATTACHED AS EXHIBIT "A" TO THE DECLARATION OF CONDOMINIUM RECCRUED NOVEMBER 4, 2002 AS DOCUMENT NUMBER 0021215983, AND AS AMINOED FROM TIME TO TIME, TOGETHER WITH ITS UNDIVIDED PERCENTAGE INTEREST IN THE COMMON ELEMENTS.

PARCEL 2:

THE EXCLUSIVE RIGHT TO THE USE OF PARKING SPACE P2-62, A LIMITED COMMON ELEMENT AS DELINEATED AND DEFINED ON THE SURVEY ATTACHED TO THE DECLARATION AFGRESALD RECORDED AS DOCUMENT NUMBER 0021215983.

PARCEL 3:

THE EXCLUSIVE RIGHT TO THE USE OF STORAGE LOCKER SL-5, A LIMITED COMMON ELEMENT AS DELINEATED AND DEFINED ON THE SURVEY ATTACHED TO THE DECLARATION AFORESAID, RECORDED AS DOCUMENT NUMBER 0021215983.

C/K/A: 6700 South Shore Drive, Unit 23C, Chicago, IL 60649

PIN: 20-24-406-026-1213



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The subject mortgage has been recorded/registered as:

Date of Mortgage: May 20, 2004

Date and place of recording: May 25, 2004 / Cook County Recorder of Deeds

Document No: 0414634135

Amount of Mortgage: \$104,400.00

Name of present owners of the real estate: James M. Kardelis a/k/a James Kardelis and Catherine Kardelis

204 COUNTY CIEPTS OFFICE

SIGNATURE:

Attorney of Record

Russell C. Wirbicki (6186310) Diana A. Carpintero (6274662)

Kenneth J. Nannini (3121924)

Laurence J. Goldstein (0999318)

James A. Meece (6256386)

James D. Major (6295217)

Christopher J. Irk (6300084)

Adam M. Vail (6301071)

The Wirbicki Law Group LLC

Attorney for Plaintiff

33 W. Monroe St., Suite 1140

Chicago, IL 60603 Phone: 312-360-9455 Fax: 312-572-7823

Atty. No. 42463

W11-2241



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W11-2241 42463

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

Wells Fargo Bank, N.A., as Trustee for the Certificateholders Park Place Securities, Inc., Asset-Backed Pass-Through Certificates Series 2004-WCW1;

Plaintiff,

VS.

James M. Kardelis a/k/. James Kardelis; Catherine Kardelis; Quadrangle House Condominium Association; Barbara Kardelis: Citibank, National Association as s/i/i to Citibank (South Dakota), N.A.; FIA Card Services, National Association f/k/a Bank of America, N.A.; Target National Bank; Unknown Heirs and Legatees of Sames M. Kardelis, if any; Unknown Heirs and Legatees of Catherine Kardelis, if any; Unknown Owners and Non Record Claimants;

Defendants.

Case No. 11 - CH - 30230

6700 South Shore Drive, Unit 23C, Chicago, IL 60649

NOTICE OF FILING L'3 PENDENS

TO: Illinois Department of Financial and Professional Regulation

ATTN: Stanley Wojciechowski 122 S. Michigan Ave., Suite 1900 Chicago, Illinois 60603

PLEASE TAKE NOTICE THAT on or about the ${\color{red} {rac{\lambda}{2}}}$ day of ${\color{red} {rac{\alpha u y v s v}{2}}}$

__, 2011, the

undersigned recorded a Lis Pendens with the Cook County Recorder of Deeds.

PIN:

20-24-406-026-1213

COMMON ADDRESS:

6700 South Shore Drive, Unit 23C, Chicago, IL 60549

Attorney for Plantiff

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Russell C. Wirbicki (6186310) Diana A. Carpintero (6274662) Kenneth J. Nannini (3121924) Laurence J. Goldstein (0999318) James A. Meece (6256386) James D. Major (6295217) Christopher J. Irk (6300084) Adam M. Vail (6301071) The Wirbicki Law Group LLC Attorney for Plaintiff 33 W. Monroe St., Suite 1140 Chicago, IL 60603 Phone: 312-300 5455 Fax: 312-572-7823 Atty. No. 42463 W11-2241

CERTIFICATE OF SERVICE

I, the undersigned, being first on oath duly sworn, deposes and states that a true copy of the above and foregoing Notice of Filing was:

personally delivered []

mailed by depositing said documents in the U.S. Mail at [x]31 W. Monroe St., Suite 1140, Chicago, IL 60603, posta ge prepaid

To the above-named address as shown above on the 25 day of August, 2011 in accordance with HB4050 Illinois Predatory Lending Database Pilot Program, - Cotto