

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

BMO HARRIS BANK N.A., AS SUCCESSOR )  
IN INTEREST TO HARRIS N.A., )

Plaintiff, )

v. )

BENJAMIN MIHAI; OLIMPIA MIHAI; )  
DISCOVER BANK; HSBC BANK NEVA A. )  
N.A.; 21 KRISTIN CONDOMINIUM )  
ASSOCIATION, AN ILLINOIS NOT-FOR-PROFIT )  
CORPORATION; UNKNOWN OWNERS )  
and NON-RECORD CLAIMANTS, )

Defendants. )

Case No. 13 CH 1840

Property Address:  
21 Kristin Drive, Unit 424  
Schaumburg, Illinois 60195

**LIS PENDENS AND NOTICE OF FORECLOSURE**

I, the undersigned, do hereby certify that the above entitled cause was filed on the 22<sup>nd</sup> day of January, 2013, for foreclosure of liens and is now pending in said court and that the property affected by said cause is described as follows:

PARCEL 1: UNIT 424 IN THE 21 KRISTIN CONDOMINIUM, AS DELINEATED ON A SURVEY OF THE FOLLOWING DESCRIBED TRACT OF LAND:

LOTS 1, 2 (EXCEPT THE EAST 206.30 FEET OF SAID LOT 2, AS MEASURED ALONG THE NORTH LINE THEREOF) AND LOT 3 IN BARRY SUBDIVISION, BEING A SUBDIVISION IN THE EAST 1/2 OF THE NORTHWEST 1/4 OF SECTION 10, TOWNSHIP 41 NORTH, RANGE 10, EAST OF THE THIRD PRINCIPAL MERIDIAN, ACCORDING TO THE PLAT THEREOF RECORDED JULY 31, 2001 AS DOCUMENT NUMBER 0010690003, WHICH SURVEY IS ATTACHED AS EXHIBIT "A" TO THE DECLARATION OF CONDOMINIUM RECORDED AS DOCUMENT NUMBER 0702615055;

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TOGETHER WITH ITS UNDIVIDED PERCENTAGE INTEREST IN THE COMMON ELEMENTS, IN COOK COUNTY, ILLINOIS.

PARCEL 2: EASEMENT FOR INGRESS AND EGRESS FOR THE BENEFIT OF PARCEL 1, AS SET FORTH IN THE RECIPROCAL EASEMENT AGREEMENT DATED AS OF JANUARY 24, 2007 AND RECORDED JANUARY 26, 2007 AS DOCUMENT 0702615054 BY AND BETWEEN 21 KRISTIN DRIVE DEVELOPERS LLC AND 24 KRISTIN COMMERCIAL LLC.

PARCEL 3: THE EXCLUSIVE RIGHT TO THE USE OF PARKING SPACE P-176, A LIMITED COMMON ELEMENT AS DELINEATED ON THE SURVEY ATTACHED TO THE DECLARATION AFORESAID.

PARCEL 4: THE EXCLUSIVE RIGHT TO THE USE OF STORAGE SPACE 4S-6, A LIMITED COMMON ELEMENT AS DELINEATED ON THE SURVEY ATTACHED TO THE DECLARATION AFORESAID.

PIN: 07-10-101-029 (Good through 2007 tax year)  
07-10-101-038-1(1) (New for 2008 tax year)

Commonly Known As: 21 Kristen Drive, Unit 424, Schaumburg, IL  
60195

Title Holders of Record: Benjamin Mihai and Olimpia Mihai

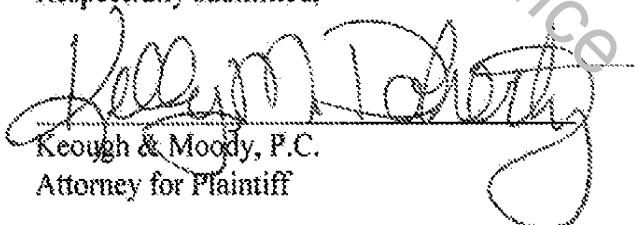
Identification of liens sought to be foreclosed: Mortgage

Name of Lien Holder: BMO Harris Bank N.A., as successor in interest to  
Harris N.A.

Date and Place of Recording: October 24, 2007, Re-Recorded December 31,  
2012; Cook County, Illinois

Document Identification: 0729746104; Re-Recorded as 1236618061

Respectfully submitted,

  
Keough & Moody, P.C.  
Attorney for Plaintiff

This Instrument Prepared by and Return Receipt To:

*Keough & Moody, P.C.*

Attorney Number 44996

1250 East Diehl Road, Suite 405

Naperville, IL 60563

(630) 245-5068

kmd@kmlegal.com

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BMO HARRIS BANK N.A., AS SUCCESSOR )  
 IN INTEREST TO HARRIS N.A., )  
 )  
 Plaintiff, )  
 v. )  
 )  
 BENJAMIN MIHAI; OLIMPIA MIHAI; DISCOVER )  
 BANK; HSBC BANK NEVADA, N.A.; 21 KRISTIN )  
 CONDOMINIUM ASSOCIATION, AN ILLINOIS )  
 NOT-FOR-PROFIT CORPORATION; UNKNOWN )  
 OWNERS and NON-RECORD CLAIMANTS, )  
 )  
 Defendants. )

2013CH01840  
 CALENDAR/ROOM 56  
 Case No. TIME 00:00  
 Owner Occupied  
 Property Address:  
 21 Kristin Drive, Unit 424  
 Schaumburg, Illinois 60195

### CERTIFICATE OF SERVICE

To: Illinois Department of Financial and Professional Regulation, Banking Division  
 122 South Michigan Avenue, Suite 1900, Attn: Stanley Wojciechowski, Chicago, IL 60603

The undersigned certifies that on January 24, 2013, a copy of the Lis Pendens and Notice of Foreclosure in the above captioned case will be served upon the above addressed party in the following manner:

- Enclosing a true copy of same in an envelope addressed to the address listed above, with first class postage fully prepaid, and depositing each of said envelopes in the United States Mail at 5:00 p.m. on said date.
- Personal delivery to the attorney of record of each party at the address(es) listed below.
- Facsimile transmission with confirmation by United States Mail.
- Via Federal Express - Express Package Service - Priority Overnight.

  
 KELLY M. DOHERTY  
 Attorney for Plaintiff

*Keough & Moody, P.C.*  
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 (630) 245-5068  
 kmnd@kmlegal.com  
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