

UNOFFICIAL COPY



Doc# 1814306145 Fee \$52.00

KAREN A. YARBROUGH

COOK COUNTY RECORDER OF DEEDS

DATE: 05/23/2018 04:03 PM PG: 1 OF 8

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

STAACK & SIMMS, P.A. )

PLAINTIFF, )

Case No. 18 L 050284

v. )

ANGELINE LATEK, )

DEFENDANT. )

RECORDING COVER SHEET

Attached is copy of the Affidavit of Foreign Judgment and Foreign Judgment Registration and underlying Foreign Judgment in favor of Stacck & Simms, P.A. and against Angeline Latek registered in the Circuit Court of Cook County as the above-referenced case on May 22, 2018.

Prepared by and return to:

Kevin V. Hunt  
Stahl Cowen Crowley Addis LLC  
55 W. Monroe, Suite 1200  
Chicago, IL 60603  
312-377-7764  
khunt@stahlcowen.com  
*Attorney for Plaintiff*

JP

# UNOFFICIAL COPY

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

STAACK & SIMMS, P.A, )  
 )  
 PLAINTIFF, )  
 )  
 v. )  
 )  
 ANGELINE LATEK, )  
 )  
 DEFENDANT. )

Case No: 2018L050284  
 CALENDAR/ROOM 5  
 TIME 00:00  
 Foreign Judgment  
 Amount of Judgment: \$49,333.51

FILED  
 2018 MAY 22 AM 11:59  
 CLERK OF CIRCUIT COURT  
 LAW DIVISION

### AFFIDAVIT

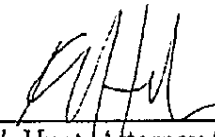
I, Kevin V. Hunt being of sound mind, legal age, and having been sworn on oath, do offer and state that is called upon to testify under oath, I could competently and on personal knowledge testify to the following facts:

1. I am one of the attorneys for Plaintiff and based on my review of information contained in the Plaintiff's file, the last known addresses for the Judgment Debtor is 15225 Poplar Creek Court, Orland Park, IL 60467.

2. The name and address for the Judgment Creditor are as follows:

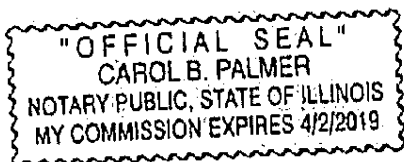
Staack & Simms, P.A.  
 900 Drew St., Ste. 1  
 Clearwater, FL 33755

FURTHER AFFIANT SAYETH NAUGHT

  
 Kevin V. Hunt, Attorney for Plaintiff

Signed and sworn to before me  
 On this 22nd day of May, 2018.

  
 Notary Public



# UNOFFICIAL COPY

Foreign Judgment Registration Cover Sheet

(Rev. 11/06/13) CCG N620

## IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

COUNTY \_\_\_\_\_ DEPARTMENT/LAW \_\_\_\_\_ DISTRICT \_\_\_\_\_

Name: Streck & Strana, P.A.

Address: 900 Drew St., Ste. 1, Clearwater, FL 33766

Plaintiff

v.

Name: Argalno Latek

Address: 15225 P. J. Creek Court, Orland Park, Illinois 80467

Defendant

Case No. \_\_\_\_\_

Case Type: \_\_\_\_\_

Amount of Judgment: \$48,333.51

2019050284  
CALENDAR ROOM 5  
TIME 08:30  
FOREIGN JUDGMENT  
MAY 22 11:41:02  
CLERK OF THE CIRCUIT COURT OF COOK COUNTY

### FOREIGN JUDGMENT REGISTRATION COVER SHEET

Please check one of the following:

- A Judgment from another Illinois county (735 ILCS 5/12-106)
- A Judgment from another Illinois county (735 ILCS 5/12-106) (735 ILCS 5/12-501; 735 ILCS 5/12-650 et seq.)

- A Judgment from another state (735 5/12-650 et seq.)
- Foreign state (735 ILCS 5/12-618 et seq.; 735 5/12-650 et seq.)

Additional Litigants (if any):

Plaintiff

Defendant

Name: \_\_\_\_\_

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Address: \_\_\_\_\_

Name: \_\_\_\_\_

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Address: \_\_\_\_\_

Name: \_\_\_\_\_

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Address: \_\_\_\_\_

Name: \_\_\_\_\_

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Address: \_\_\_\_\_

CLERK

**STAPLE THIS COVER SHEET TO THE AUTHENTICATED FOREIGN JUDGMENT. IT IS PART OF THE PERMANENT FILE.**

Atty. No.: 38842  Pro Se 99500

Name: Kevin V. Hunt

Atty. for Plaintiff: Stahl Cowen Crowley Addis LLC

Address: 55 W. Monroe Street, Suite 1200

City/State/Zip Code: Chicago, IL 60603

Telephone: 312-377-7764

Service via email from opposing party/counsel will be accepted at:

khunt@stahlcowen.com

by consent pursuant to Ill. Sup. Court Rules 11 and 131.

**Pro Se Only:**  I have read and agree to the terms of the Clerk's Office Electronic Notice Policy and choose to opt in to electronic notice from the Clerk's office for this case at this email address:

**DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS**

I#: 2015034516 BK: 18869 PC: 1703 12/05/2015 at 14:01 PM, RECORDING  
BURKE, CLERK OF COURT AND COMPTROLLER PINELLAS COUNTY, FL BY DEPUTY ( CLKPR06

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT  
IN AND FOR PINELLAS COUNTY, FLORIDA  
UCN 522008CA000349XXCICI  
CASE NO. 08-349-CI-20

RECEIVED  
DEC 04 2017  
BY:

FIFTH THIRD BANK, a Michigan  
Banking Corporation,

Plaintiff,

vs.

FRANK LATEK and  
ANGELINE LATEK.

Defendants.

FILED  
CMA COURT REC. DEPT.  
2015 JAN 30 PM 4:13  
KEN BURKE  
CLERK OF CIRCUIT COURT

**ORDER GRANTING AMENDED MOTION TO ADJUDICATE CHARGING LIEN AND  
AWARD *IN PERSONAM* JUDGMENT AGAINST THE LITIGANTS**

THIS CAUSE came to be heard before this Court on January 29, 2015, on Staack, Simms & Hernandez, P.A. n/k/a Staack & Simms, P.A.'s Amended Motion to Adjudicate Charging Lien and Award *In Personam* Judgment Against the Litigants, and the Court, having reviewed the file and heard argument of counsel, and being otherwise fully advised in the premises:

1. All of the elements necessary to impose a charging lien have been met, including timely notice. In order to give timely notice of a charging lien, an attorney should either file a Notice of Lien or otherwise pursue the lien in the original action. Zimmerman v. Livnat, 507 So.2d 1205, 1206 (Fla. 4<sup>th</sup> DCA 1987) (citing Sinclair, 428 So.2d 1383 (Fla. 1983)); see also, Daniel Mones, P.A. v. Smith, 486 So.2d 559, 561 (Fla. 1986).

2. Staack, Simms & Hernandez, P.A. n/k/a Staack & Simms, P.A. provided timely notice of the charging lien in accordance with Florida law on May 12, 2011, prior to the entry of a

**UNOFFICIAL COPY**

Notice of Voluntary Dismissal in this action.

3. For reasons of law and equity, Staack, Simms & Hernandez, P.A. n/k/a Staack & Simms, P.A. is entitled to a charging lien, it is hereby

**ORDERED AND ADJUDGED that:**

1. Staack, Simms & Hernandez, P.A. n/k/a Staack & Simms, P.A. Amended Motion to Adjudicate Charging Lien and Award *In Personam* Judgment Against the Litigants in the amount of \$34,542.79 is GRANTED.

2. Staack, Simms & Hernandez, P.A. n/k/a Staack & Simms, P.A. shall have a lien on any recovery, fruits and real and/or personal property obtained by or awarded to Defendants, ANGELINE LATEK and THE ESTATE OF FRANK LATEK, jointly and severally, in this matter.


3. Staack, Simms & Hernandez, P.A. n/k/a Staack & Simms, P.A., whose address is 900 Drew Street, Suite 1, Clearwater, Florida 33755, shall recover and is awarded an *in personam* judgment against Defendants, ANGELINE LATEK and THE ESTATE OF FRANK LATEK, jointly and severally, whose address is 15225 Poplar Creek Court, Orland Park, IL 60467 and 71 Silo Ridge East, Orland Park, IL 60467, in the sum of \$34,542.79, plus prejudgment interest in the amount of \$14,790.72, making a total of \$49,333.51, that shall bear interest at the prevailing statutory interest rate of 4.75% per year from this date through December 31 of this current year, for which let execution issue. Thereafter, on January 1 of each succeeding year until the judgment is paid, the interest rate will adjust in accordance with section 55.03, Florida Statutes.

**UNOFFICIAL COPY**

4. The Court retains jurisdiction of this action to enter further Orders that are proper.

DONE AND ORDERED in Chambers, at Clearwater, Pinellas County, Florida, on

January 30, 2015.

  
HONORABLE BRUCE BOYER  
CIRCUIT COURT JUDGE

Copies to:

James A. Staack, Esquire

Gregory M. McCoskey, Esquire

Brian Basil, Esquire.

Angeline Latek, *pro se*

Kent Runnels, Esq.

Ted Kowalczyk, Esquire

Douglas M. Williamson, Esquire

James A. Byrne, Esq.



# UNOFFICIAL COPY

STATE OF FLORIDA  
COUNTY OF PINELLAS

I, KEN BURKE, Clerk of the Circuit Court in and for Pinellas County, do hereby certify that as such Clerk I have custody of and am the Officer having charge of the records of said Court and that the above and foregoing is a true and correct photostatic copy of

FIFTH THIRD BANK, a Michigan  
Banking Corporation

Plaintiff

and

FRANK LATEK and  
ANGELINE LATEK

Defendant

REF #: 08-349-CI

DATE FILED:  
JANUARY 30, 2015

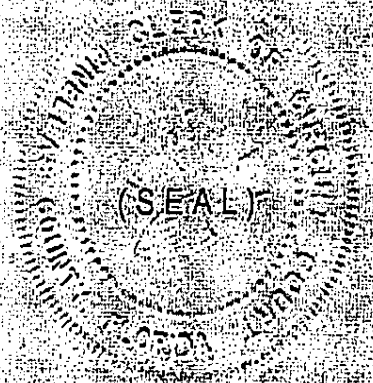
ORDER GRANTING AMENDED MOTION TO  
ADJUDICATE CHARGING LIEN AND AWARD  
PERSONAM JUDGMENT AGAINST THE  
LITIGANTS OR:18660 PG:1703

as the same now appears of record and among the files of said Court.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal of said Court at Clearwater, Florida, this 1<sup>ST</sup> day of December, 2017.

KEN BURKE  
Clerk of the Circuit Court

By Naomi Howard  
Deputy Clerk

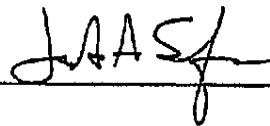


# UNOFFICIAL COPY

STATE OF FLORIDA  
COUNTY OF PINELLAS

I, JOHN A SCHAEFER, one of the presiding Judges of the Circuit Court of the Sixth Judicial Circuit of Florida, in and for Pinellas County, duly elected, qualified and acting, hereby certify that KEN BURKE, whose name is signed to the foregoing certificate, is now and was on the date stated in the said certificate, Clerk of the Circuit Court in and for Pinellas County, Florida, duly elected, qualified, commissioned and acting, and that he is the custodian and the Officer having charge of all of the records, files and judicial proceedings in said County and that the above and foregoing certificate of the said KEN BURKE, as the Clerk of the Circuit Court, certifying to the transcription of certain instruments, recorded in the public records of Pinellas County, Florida, is duly signed by KEN BURKE, as said Clerk, and that the seal affixed to said certificate is the seal of said Circuit Court for said County, and that the attestation of said Clerk to said transcription of the record is in due form.

WITNESS my hand in the State and County aforesaid, this 1st day of December, 2017.



CIRCUIT JUDGE OF THE SIXTH  
JUDICIAL CIRCUIT  
PINELLAS COUNTY, FLORIDA

STATE OF FLORIDA  
COUNTY OF PINELLAS

I, KEN BURKE, hereby certify that I am the Clerk of the Circuit Court of the Sixth Judicial Circuit of the State of Florida, in and for Pinellas County, duly elected, qualified, commissioned and acting, and that the foregoing certificate, purporting to be signed by the HONORABLE JOHN A SCHAEFER, Circuit Judge, is in fact signed by him, and that the signature thereto affixed is the signature of said Honorable JOHN A SCHAEFER, Circuit Judge, and that he was on the date stated in said certificate and still is one of the presiding Judges of said Circuit, duly elected, qualified, commissioned and acting in and for said Circuit.

WITNESS my hand and the seal of said County, this 1st day of December, 2017.



KEN BURKE  
CLERK OF THE CIRCUIT COURT  
PINELLAS COUNTY, FLORIDA

(SEAL)