

Doc#: 1926928013 Fee: \$98.00
Edward M. Moody
Cook County Recorder of Deeds
Date: 09/26/2019 10:47 AM Pg: 1 of 10

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
County Department, Law Division

Laguna Commercial Capital, LLC, a Delaware
limited liability company,

Judgment Creditor,

-vs-

Southeast Texas EMS, LLC, a Texas limited liability company;
Sean Fitzgerald, an individual; Jason Boever, an individual, et. al.,

Judgment Debtors.

No. 2019L-050574

JUDGMENT COVER SHEET

Judgment was entered on September 18, 2019 in favor of Laguna Commercial Capital, LLC and against **Jason Boever** in the amount of \$1,181,442.28, plus costs, a certified copy of which is attached hereto.

Last Known Address of Judgment Debtor:

Jason Boever
1707 W. Shirra Ct.
Arlington Heights, IL 60004

County: Cook

PREPARED BY/MAIL TO:

TELLER, LEVIT & SILVERTRUST, P.C.
Attorneys for Plaintiff/Judgment Creditor
19 South LaSalle Street, Suite 701
Chicago, Illinois 60603
(312) 922-3030
Firm No. 90818
E-mail: kposen@tellerlevit.com

petforj 8/9/19
170650 KEP/LE
Foreign Judgment Registration Cover Sheet

UNOFFICIAL COPY

(Rev. 11/06/13) CCG N620
FILED
9/18/2019 1:06 PM
DOROTHY BROWN
CIRCUIT CLERK
COOK COUNTY, IL
6619889

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS County Department, Law Division

Laguna Commercial Capital, LLC, a Delaware
limited liability company,)
)
)
)
Plaintiff,)
)
-vs-)
)
)
)
Southeast Texas EMS, LLC, a Texas limited liability company;)
Sean Fitzgerald, an individual; Jason Boever, and individual, et. al.)
)
)
Defendants.)

Case No: **2019L050574**
Case Type: Foreign Judgment
Amount of Judgment **\$1,181,442.28**
plus interest and costs

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 a Federal Court (735 ILCS 5/12-501)
- A Judgment from another state (735 5/12-650 et seq.)
- Foreign state (735 5/12-618 et seq.; 735 5/12-650 et seq.)

Additional Litigants (if any)

Plaintiff

Defendant

Name: Laguna Commercial Capital, LLC, a Delaware

Name: Jason Boever

Address: 465 Forest Avenue, Suite H
Laguna Beach CA 92651

Address: 1707 W. Shirra
Arlington Heights IL 60004

Name: _____

Name: _____

Address: _____

Address: _____

Name: _____

Name: _____

Address: _____

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Name: _____

Name: _____

Address: _____

Address: _____

CLERK

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

Firm No. 90818

Service via email from opposing party/counsel will be
accepted at kposen@tellerlevit.com

Name: Teller, Levit & Silvertrust, P.C.
Atty. for Plaintiff: Laguna Commercial Capital, LLC
Address: 19 S. LaSalle Street, Suite 701
City/State/Zip: Chicago, Illinois 60603
Telephone: (312) 922-3030

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

FILED DATE: 9/18/2019 1:06 PM 2019L050574

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petforj 8/9/19 170650 KEP/LE

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS County Department, Law Division

FILED
9/18/2019 1:06 PM
DOROTHY BROWN
CIRCUIT CLERK
COOK COUNTY, IL
6619889

Laguna Commercial Capital, LLC, a Delaware
limited liability company,)

Judgment Creditor,)

-vs-

Southeast Texas EMS, LLC, a Texas limited liability company;)
Sean Fitzgerald, an individual; Jason Boever, an individual, et. al.,)

Judgment Debtors.)

No2019L050574

Judgment Amount: \$1,181,442.28
plus interest and costs

FILED DATE: 9/18/2019 1:06 PM 2019L050574

FILING OF A FOREIGN JUDGMENT

NOW COMES the Judgment Creditor, Laguna Commercial Capital, LLC, by and through its attorneys, TELLER, LEVIT & SILVERTRUST, P.C., and respectfully represents unto this Honorable Court as follows:

1. On October 2, 2012, Judgment was entered in favor of Laguna Commercial Capital, LLC and against the Judgment Debtors, Southeast Texas EMS, LLC, a Texas limited liability company; Sean Fitzgerald; and Jason Boever, in the United States District Court, Central District of California, under Case No. CV11-09930, in the amount of \$1,181,442.28, as reflected on the authenticated copy of said Judgment attached hereto and by reference made a part hereof as Exhibit "1".

2. Judgment Creditor, Laguna Commercial Capital, LLC, further represents that there is a total balance due and owing on the Judgment in the amount of \$1,181,442.28, plus costs of \$1,928.40.

3. The judgment noted above is being filed with this Court in accordance with titled Registration of Federal Judgments Chapter 735 ILCS §5/12-501.

LAGUNA COMMERCIAL CAPITAL, LLC
Judgment Creditor herein,

By: 

Kevin E. Posen
One of its attorneys

I hereby certify that the document to which this
certification is affixed is a true copy.
SEP 24 2019
Dorothy Brown
Clerk of the Circuit Court
of Cook County, IL



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VERIFICATION BY CERTIFICATION

Under penalties as provided by law pursuant to §1-109 of the Illinois Code of Civil Procedure, the undersigned, as attorney for the Judgment Creditor, certifies that the statements set forth in this Filing of a Foreign Judgment are true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.



Kevin E. Posen

TELLER, LEVIT & SILVERTRUST, P.C.
Attorneys for Judgment Creditor
19 South LaSalle Street, Suite 701
Chicago, Illinois 60603
312-922-3030
Firm No. 90818
E-mail: kposen@tellerlevit.com

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UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA

Laguna Commercial Capital LLC

CASE NUMBER

2:11-cv-09930 MMM (PLAx)

PLAINTIFF(S)

v.
Southeast Texas EMS LLC, et al

EXEMPLIFIED CERTIFICATE

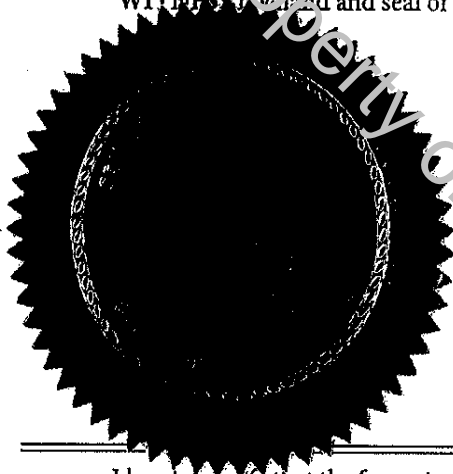
DEFENDANT(S)

I, Kiry K. Gray, Clerk of the United States District Court, Central District of California, do hereby certify that the annexed is a full, true and correct copy of the original

Judgment

in the above entitled case, on file in my office.

WITNESS my hand and seal of said Court this 11th day of June, 2019



Kiry K. Gray

Kiry K. Gray, Clerk of Court

By: *Lori Wagers*
Deputy Clerk

I hereby certify that the foregoing certificate of the Clerk of the United States District Court, Central District of California, is in due form and that the signature attached hereto is the true signature of the Clerk of said Court.

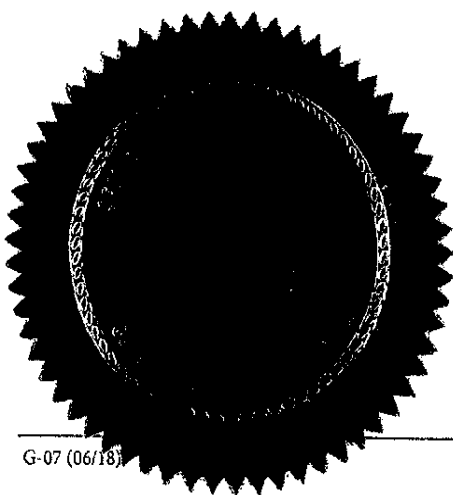
6/11/2019

Date

Douglas F. McCormick
DOUGLASE McCORMICK
United States Magistrate Judge

I, Kiry K. Gray, Clerk of the United States District Court, Central District of California, do hereby certify that the Honorable Douglas F. McCormick is, upon the date hereof, a U.S. Magistrate Judge of said Court and that the signature to the above certificate is the true signature of said Magistrate Judge

WITNESS my hand and seal of said Court this 11th day of June, 2019



Kiry K. Gray

Kiry K. Gray, Clerk of Court

By: *Lori Wagers*
Deputy Clerk

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

LAGUNA COMMERCIAL CAPITAL,
LLC, a Delaware limited liability
company,

Plaintiff,

vs.

SOUTHEAST TEXAS EMS, LLC, a
Texas limited liability company; SEAN
FITZGERALD, an individual; JASON
BOEVER, an individual, and DOES 1
through 10, inclusive,

Defendants.

CASE NO. CV 11-09930 MMM (PLAx)

JUDGMENT

On September 30, 2012, the court entered an order granting the motion of plaintiff Laguna Commercial Capital, LLC ("LCC") for default judgment. Accordingly,

IT IS ORDERED AND ADJUDGED:

1. That LCC recover damages in the amount of \$1,181,442.28 from defendants Southeast Texas EMS, LLC ("SETX"), Sean Fitzgerald and Jason Boever;
2. That LCC recover attorneys' fees in the amount of \$27,228.85 from defendants

Plaintiff's
Exhibit *1B*

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Case 2:11-cv-09930-MMM-PLA Document 45 Filed 10/02/12 Page 2 of 3 Page ID #:1004

1 SETX and Fitzgerald;

2 3. That defendants SETX and Fitzgerald, and their respective officers, agents,
3 servants, employees, attorneys, and those persons in active concert or participation
4 with any of them be

5 a. enjoined from: (a) transferring, disposing of, dissipating, or encumbering
6 accounts or proceeds purchased by Plaintiff under the SETX Factoring Agreement
7 and/or MedQuest Factoring Agreement ("Plaintiff's Accounts") (and/or proceeds
8 thereof) and/or any assets that serve as collateral to Plaintiff under the SETX
9 Factoring Agreement and/or the MedQuest Factoring Agreement including, but not
10 limited to, Commercial Insurance Receivables ("CIR") and Governmental Program
11 Receivables ("GPR"); (b) instructing account debtors to pay SETX directly instead
12 of sending payments to the designated Lockbox Account or GPR Account, on
13 Plaintiff's Accounts; (c) endorsing any negotiable instruments received as payment
14 on Plaintiff's Accounts; (d) transferring, converting, loaning, encumbering,
15 pledging, concealing, dissipating, spending, or otherwise disposing of any proceeds
16 that have been received as payment on Plaintiff's Accounts; and/or (e) destroying
17 writings reflecting payments made on Plaintiff's Accounts.

18 b. Mandating, authorizing and directing all commercial payers (on SETX or
19 MedQuest accounts), that all payables owed to SETX or MedQuest (payments on
20 uncollected accounts under the SETX or MedQuest Factoring Agreements), be sent
21 to the designated Lockbox Account established at SNB Bank of Austin (until the
22 Judgment is fully satisfied, at the following address:

23 Southeast Texas EMS, LLC
24 c/o Laguna Commercial Capital, LLC
25 Stillwater National Bank
26 P.O. Box 26168
27 Oklahoma City, OK 73126-0618
28 Lock Box Account Number: 5190585

c. Mandating, authorizing and directing Medicare (including any and all
intermediaries and/or carriers responsible for processing the claims such as

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FILED DATE: 9/18/2019 1:06 PM 2019L050574

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Trailblazer Health Enterprises, LLC) and/or Medicaid (including the Texas Department of Health and Human Services Commission) that all payments on uncollected accounts under the SETX or MedQuest Factoring Agreement be sent to the designated GPR account established at SNB Bank of Austin, until the judgment is fully satisfied, as follows:

Southeast Texas EMS, LLC
c/o Laguna Commercial Capital, LLC
Stillwater National Bank
P.O. Box 1988
Oklahoma City, OK 74076
GPR Account Number: 5190618
Routing Number: 103101437

d. Mandating, authorizing, directing Chase Bank and that all current and future funds/proceeds from the SETX operating (Account No. 000001592748980) and savings account (Account No. 000001833897901) at Chase Bank be transferred and sent to Plaintiff or to the designated Lockbox account identified in subparagraph (b) above to the extent that such funds are derived from activity prohibited by this order.

- 4. That LCC is the sole owner of the CIR and GPR accounts established pursuant to the SETX and MedQuest Factoring Agreements, and that it has the sole right to payments and proceeds of these accounts.
- 5. That LCC recover costs from defendants SETX, Fitzgerald and Boever in the amount of \$1,928.40;
- 6. That this judgment shall bear post-judgment interest at the legal rate; and
- 7. That the court retains continuing jurisdiction to enforce the injunctive provision of this judgment.

DATED: September 30, 2012

Margaret M. Morrow
MARGARET M. MORROW
UNITED STATES DISTRICT JUDGE

Plaintiff's
Exhibit *ID*

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FILED DATE: 9/18/2019 1:06 PM 2019L050574

Property of Cook County Clerk's Office

I hereby attest and certify on 10-1-19
that the foregoing document is a full, true
and correct copy of the original on file in
my office, and in my legal custody.

CLERK U.S. DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Lou Walters
DEPUTY CLERK



1225

Plaintiff's
Exhibit 1E

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petforj 8/9/19
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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
County Department, Law Division

FILED
9/18/2019 1:06 PM
DOROTHY BROWN
CIRCUIT CLERK
COOK COUNTY, IL
6619889


Laguna Commercial Capital, LLC, a Delaware
limited liability company,)
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Judgment Creditor,)
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Southeast Texas EMS, LLC, a Texas limited liability company;)
Sean Fitzgerald, an individual; Jason Boever, an individual, et. al.,)
)
)
Judgment Debtors.)

No. 2019L050574

VERIFICATION BY CERTIFICATION OF LAST KNOWN ADDRESS
IN COMPLIANCE WITH CHAPTER 735 ILCS 65/12-653
OF THE UNIFORM ENFORCEMENT OF FOREIGN JUDGMENTS ACT

Under penalties as provided by law pursuant to §1-109 of the Illinois Code of Civil Procedure, the undersigned, as attorney for the Judgment Creditor, certifies that the statements set forth in this Verification are true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.

1. The name and last known address of the Judgment Debtor is:
 - a. Jason Boever, 1707 W. Shirra, Ct., Arlington Heights IL 60004
2. The name and last known address of the Judgment Creditor is Laguna Commercial Capital, LLC, 465 Forest Avenue, Suite H, Laguna Beach CA 92651.
3. Judgment Creditor requests that the Clerk of the Circuit Court of Cook County, Illinois mail Notice of the Filing of Foreign Judgment to the Judgment Debtor at the address given above and make a note of the mailing in the court docket.



Kevin E. Posen

TELLER, LEVIT & SILVERTRUST, P.C.
Attorneys for Judgment Creditor
19 South LaSalle Street, Suite 701
Chicago, Illinois 60603
(312) 922-3030
Firm No. 90818
E-mail: kposen@tellerlevit.com

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

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