

# UNOFFICIAL COPY

Doc#. 2213239006 Fee: \$98.00  
Karen A. Yarbrough  
Cook County Clerk  
Date: 05/12/2022 06:39 AM Pg: 1 of 5

Atty. No.: 48928

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

**BMO Harris Bank, N.A.**

**Plaintiff,**

vs.

**Joan Pennington; Joan Pennington, as Trustee of  
the Joan Pennington Living Trust pursuant to the  
terms of a Trust Agreement dated December 30th,  
2010; Unknown Owners and Non-Record  
Claimants; 535 N. Michigan Ave. Condominium  
Association**

**Defendants.**

Case No. 2022CH04460

535 North Michigan Avenue Unit 1804,  
Chicago, IL 60611

Judge Joel Chupack

Cal 57

**LIS PENDENS  
NOTICE OF FORECLOSURE**

I, the undersigned, do hereby certify that the above entitled cause was filed in the above Court on May 10, 2022, for Foreclosure and is now pending in said Court and that the property affected by said cause is described as follows:

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Parcel A: Unit 1804 in 535 N. Michigan Avenue Condominium, as delineated on the survey of a portion of the following property (collectively referred to as "parcel"):

Parcel 1: Lot 7 in Assessor's division of the South 1/2 and the East 100 feet of the North 1/2 of Block 21 in Kinzie's addition to Fractional Section 10, Township 39 North, Range 14, East of the Third Principal Meridian, in Cook County, Illinois.

Parcel 2: Lots 8 and 9 in Assessor's division of the South 1/2 and the East 100 feet of the North 1/2 of Block 21 in Kinzie's addition to Chicago in Section 10, Township 39 North, Range 14, East of the Third Principal Meridian, in Cook County, Illinois.

Parcel 3: Lot 7 in W.L. Newberry's subdivision of the North 118 feet of the West 200 feet of Block 21 in Kinzie's addition to Chicago in Section 10, Township 39 North, Range 14, East of the Third Principal Meridian, in Cook County, Illinois.

Parcel 4: The Triangular shaped part of the East and West public alley lying West of and adjoining the East line of Lot 7, Extended South, to its Intersection with the South line of Lot 7, Extended East, in said Newberry's subdivision, being that portion of said alley vacated by ordinance passed October 11, 1961 and recorded November 1, 1961 as Document Number 18318484, East of the Third Principal Meridian, in Cook County, Illinois, which Survey is attached as Exhibit "A" to the Declaration of Condominium recorded as Document Number 25290228 and filed as Document Number LR 3177574 together with its undivided percentage interest in common elements as defined and set forth in the Declaration of Condominium, in Cook County, Illinois.

Parcel 'B': Easement for the benefit of Parcel 'A' for ingress, egress and support as disclosed by the Declaration of Easements, Covenants and Restrictions dated December 15, 1979 and recorded December 28, 1979 as Document 25298696 and filed as Document LR 3138565 and as created by deed recorded as Document 25332942 and filed as Document LR3152413

Commonly known as: 535 North Michigan Avenue Unit 1804, Chicago, IL 60611

Tax Parcel No.: 17-10-122-025-1238

The subject mortgage has been recorded June 24, 2003 as Document Number 0317529196, Cook County, Illinois records.

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The title holders of the subject property are Joan Pennington, as Trustee of the Joan Pennington Living Trust pursuant to the terms of a Trust Agreement dated December 30th, 2010

Prepared by and Return To:

Jenna M. Rogers (6308109)  
Andrew K. Weiss (6284233)  
Alan S. Kaufman (6289893)  
Zachariah L. Manchester (6303885)  
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Atty. No.: 48928  
Email: sef-JMRogers@manleydeas.com

BMO Harris Bank, N.A.

BY: /s/ Jenna M. Rogers  
One of Plaintiff's Attorneys

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BMO Harris Bank, N.A.

Plaintiff,

vs.

Joan Pennington; Joan Pennington, as Trustee of the Joan Pennington Living Trust pursuant to the terms of a Trust Agreement dated December 30th, 2010; Unknown Owners and Non-Record Claimants; 535 N. Michigan Ave. Condominium Association

Defendants.

Case No. 2022CH04460

535 North Michigan Avenue Unit 1804,  
Chicago, IL 60611

Judge Joel Chupack

Cal 57

**COMPLIANCE WITH PREDATORY LENDING DATABASE SECTION OF  
RESIDENTIAL REAL PROPERTY DISCLOSURE ACT**

TO: Illinois Department of Financial and Professional Regulation  
100 West Randolph Street, 9<sup>th</sup> Floor  
Chicago, Illinois 60601

City of Chicago  
c/o Chicago City Clerk's Office  
121 N. LaSalle Street, Room 107  
Chicago, IL 60602

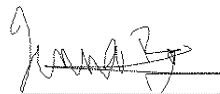
**CERTIFICATION**

I, the undersigned attorney, certify that I prepared this notice on May 11, 2022 to be filed along with a copy of the lis pendens notice with the above entitled address.

Under penalties as provided by law pursuant to 735 ILCS 5/1-109, the undersigned certifies that the statements set forth in this instrument 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.

MANLEY DEAS KOCHALSKI LLC  
Attorneys for Plaintiff  
One East Wacker, Suite 1250  
Chicago, IL 60601  
Telephone: 312-651-6700  
Fax: 614-220-5613  
Atty. No.: 48928

Email: sef-JMRogers@manleydeas.com



Signature

Jenna M. Rogers

Printed Name

Attorney

Manley Deas Kochalski LLC

5/11/22

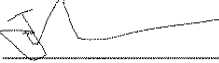
Date

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## CERTIFICATE OF SERVICE

Under penalties as provided by law pursuant to 735 ILCS 5/1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that true and correct copies of this Certificate of Service and Lis Pendens were served on the Parties named below, via electronic submission, on  
\_\_\_\_\_ 5/11 \_\_\_\_\_, 2022.

Signed and Certified \_\_\_\_\_



Illinois Department of Financial  
and Professional Regulation  
100 West Randolph Street, 9<sup>th</sup> Floor  
Chicago, IL 60601

Property of Cook County Clerk's Office