

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS, DISTRICT

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John Berlongieri
v.
Robert F. Ahlgrim, Jr. and
Jack Chapman,
S.H.T. 9954,
Alvina Britton,
Dorothy B. Brown

Plaintiff... No.
Contract
Amount Claimed \$ \$15,000.00
Defendant... Return Date * ~~12-20-90~~ \$20.25
DEPT. OF RECORDING
T4444 TRAN 6118 11/29/90 09:56:00
#0623 + D *-90-579649
COOK COUNTY RECORDER

COMPLAINT
(Breach of Contract or Agreement)

The plaintiff... claim... follows:

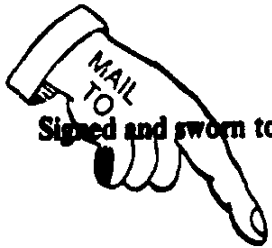
1. Lien No. 90471133 entered 9-27-90 in Cook County Recorder's Office. Pursuant to Illinois Revised Stats Chapter 82 S34, Plaintiff is filing suit to enforce the Mechanic's Lien claimed in Document Number 90471133 having been filed in the Office of the Recorder of Deeds of Cook County, Illinois.

1A. That Plaintiff is filing suit within (30) days of service of document DEMAND TO INITIATE SUIT OF ENFORCE MECHANIC'S LIEN serve by Frank J. LaVecchia from ROBERT F. AHLGRIM, JR. and JACK CHAPMAN. served October 30, 1990.

NOW COMES the Plaintiff, and possibly a future attorney, and complains as follows against the Defendants:

That from time to time Defendants and Plaintiff entered into written and oral Contract and agreement(s) (and as more fully detailed in the attached Exhibit(s) FOR the supply of goods, wares, merchandise, or services to Defendants by Plaintiff and those written or oral agreements are memorialized by these invoices, receipts or statement(s) , for material purchased and used in premises of addresses shown.

- 2) That Defendants already received consideration for said agreement(s)
 - 3) That Plaintiff has duly performed its duties pursuant to said agreement in a reasonable and prudent manner as per instructions of work to be performed
- I, JOHN BERLONGIERI..... on oath state that I am the..... plaintiff in the above entitled action. The allegations in this complaint are true.



John Berlongieri
Signed and sworn to before me 19.....

..... Notary public

-90-579649

Name
Attorney for
Address
City
Telephone
Atty No.

JOHN BERLONGIERI
14873 LINCOLN AVE.
DOLTON, IL. 60419

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Complaint Verified

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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS, DISTRICT

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John Berlongieri

Plaintiff...

v.

Robert F. Ahlgrim, Jr. and
Jack Chapman,
S.H.T. 9954,
Alvina Britton,
Dorothy B. Brown

Defendant...

No.

Contract

Amount Claimed \$ \$15,000.00

Return Date 12-20-80

COMPLAINT

The plaintiff... claim... as follows:

and material used as per Defendants. (4) That Defendants have failed to perform their duties pursuant to said Agreement(s) in that Defendants have failed to pay Plaintiff on timely basis and/or according to said agreement. (4a) Defendants failed to provide Plaintiff with money to be used for material as agreed. (5) That Defendants came up with additional work totaling approximately \$2,000.00 dollars other than agreed as per exhibit (A&B), which also Plaintiff has not been compensated at all. (6) That Defendants breached their contract for additional work or changes to be made as follows: (a) instead of repairing some appliances as per instructions given by Defendants of work to be done by Plaintiff that now after work had already been performed, Defendants decided to have same appliances and items completely replaced with new items. (b) that a General City Inspection was held at a later date and time after work was already done which required these items to be replaced with new items. (7) That Defendants breached their contract with Plaintiff by hiring someone else to continue with the work already contracted to Plaintiff without any notice of any kind that such action would take place. (8) That Plaintiff has repeatedly tried to contact Defendants at least 20 times from time to time throughout this period, which resulted in Defendants ignoring Plaintiff completely to purposely avoid paying Plaintiff the money due and owing. (9) That Plaintiff to this day has suffered an actual monetary loss for material purchased and installed on the premises of: (a) \$1,100.00 of material used and money loaned to Mr. Chapman (Defendant), (b) 800.00 wages paid each partially for two (2) helpers, totaling \$1,600.00, (c) loss of approximately \$1,500.00 of time lost in chasing Defendants around trying to collect the money owing, because of other work Plaintiff could have done on other jobs during the same period of time lost, (d) \$2,500.00 for actual work performed by Plaintiff for approximately 3 weeks. (e) that a total of \$6,700.00 of above has actually been suffered by Plaintiff. (10) That the remaining balance of the total of \$15,000.00 is due to the Breach of Contract on Defendants' part to allow Plaintiff to perform the remaining work. (11) That as a result of Defendants' Breach of said agreement(s), Plaintiff has suffered all these damages already outlined. Wherefore,

I, on oath state that I am the plaintiff in the above entitled action. The allegations in this complaint are true.

Signed and sworn to before me 19.....

..... Notary public

Name
Attorney for
Address
City
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Atty No.

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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS, DISTRICT

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John Berlongieri
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Plaintiff...

No.

Contract

Amount Claimed \$ 15,000.00

Return Date 12-20-90

Robert F. Ahlgrim, Jr. and
Jack Chapman,
S.H. 2. 9954,
Alvina Britton - Dorothy B. Brown

Defendant...

COMPLAINT

The plaintiff... claim... as follows:

1. the Plaintiff respectfully prays this Honorable court enter Judgement in favor of Plaintiff and against Defendant in the sum of \$15,000.00 plus attorney fees and court costs. That Plaintiff also prays this Honorable court to allow the lien placed on premises as per Cook County Recorder to remain on until such payment is made.

The Statements set forth in this instrument are true and correct on information such matters the undersigned certifies as aforesaid that he verify believes the same to be true.

John Berlongieri

I, on oath state that I am the plaintiff in the above entitled action. The allegations in this complaint are true.

Signed and sworn to before me 19....

.....Notary public

Name
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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS, DISTRICT

PAGE 4

John Berlongieri

Plaintiff...

No.

Contract

Amount Claimed \$ 15,000.00

Defendant...

Return Date 12-20-90

Robert F. Ahlgrim, Jr. and Jack Chapman, S.H.T. 9954, Alvina Britton, Dorothy B. Brown

COMPLAINT

EXHIBIT-A&B

The plaintiff claim follows: 587 Forsythe, Calumet City, Il. - installed vinyl siding, 3 squares, removed old boards on house 1st & 2nd floor. 588 Forsythe, Calumet City, Il. installed Ridgid pipe and PVC pipe as per Defendant instructions: (1) ran complete water lines from basement to 2nd fl. front bathroom for hot & cold water for sink and bathtub. (2) ran complete toilet sewer vent stack for 2nd fl. front toilet. (3) Boxed in completely lower part of bathroom sink and toilet pipes as per instructions of Defendants. (4) installed towel racks 2nd fl. front apartment (5) enclosed opening by bathtub 2nd fl. front (6) repaired hole on floor 2nd fl. front (kitchen). (7) repaired old faucet and later installed new faucet 2nd fl. front. (8) trimmed and adjusted old door to close properly 2nd fl. front bathroom. (9) removed and installed new lock 2nd fl. front (10) ran and connected water lines and drainlines for sink and toilet 2nd fl. rear (11) repaired faucet for bathtub 2nd fl. rear. Installed legs for bathroom sinks 2nd fl. front & rear (12) removed old medicine cabinet and installed new one 2nd fl. rear. (13) installed and separated gas lines for individual gas meter for all three apartment for 1st fl. & 2nd fl. (14) removed old hot water tank and installed new one in basement. (15) ran some new water lines in basement for building (16) plugged up open drains in basement (17) installed new latches and handles for all windows 2nd fl. front and rear (18) installed new faucet on outside of building (19) repaired gutters in rear of building (20) installed new downspout around building (21) repaired siding in Southwest side of building (22) removed and replaced numerous broken windows (23) Took measurements for all windows and doors (24) framed in and repaired hole on staircase leading to 2nd fl. (25) ran complete gas line to separate 2nd fl. front and rear gaslines (26) repaired 1st fl. bathroom sink and toilet (27) repaired leak on kitchen sink 1st fl. (28) repaired open crawl trap hole on 2nd fl. rear (29) placed a deposit of \$200 for windows ordered for 587 Forsythe, Calumet City, Il. (30) replaced toilet and sink valves (31) installed new faucet in 2nd fl. rear (32) seal cracks throughout building (33) installed corner and baseboard moulding in places (34) framed and installed clothes rod 2nd fl. front (35) installed long pressure relief valve pipe. (36) installed complete drain for kitchen sinks all the way from 2nd fl. to basement (37) Boxed in pipes in 1st fl. bedroom (38) Boxed in pipes by 2nd fl. staircase (39) installed new drywall for 1st fl. bedroom ceiling

I, on oath state that I am the plaintiff in the above entitled action. The allegations in this complaint are true.

Signed and sworn to before me 19...

..... Notary public

Name Attorney for Address City Telephone Atty No.

90579619

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PAGE 5

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Dorothy S. Brown

Defendant...

Amount Claimed \$.. \$15,000.00.....

Return Date 12-20-90.....

COMPLAINT

The plaintiff... claim... as follows:

106-154th Place, Calumet City, Il.

(40) installed new

- 1. steel door, new glass block windows, and numerous other windows throughout the building on 1st and 2nd fl. (41) removed and replaced numerous broken glass windows.

503-155th St., Calumet City, Illinois

Spent time in checking job out for all work to be done.

JOHN BERLONGIERI on oath state that I am the
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John Berlongieri.....

Signed and sworn to before me 19.....

..... Notary public

Name
 Attorney for
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 Atty No.

JOHN BERLONGIERI
14873 LINCOLN AVE
DOLTON, IL. 60419

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