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

BRICKYARD BANK,)
Plaintiff)
vs)
HADI ALI KHAN)
and SARTAJ KHAN,)
Defendants)

92211691

NO.

920103010

COMPLAINT FOR FORECLOSURE OF MORTGAGE

Now comes the Plaintiff by and through their attorney, MAX A. ABRAMS, complaining of the defendants herein, states as follows:

1. Plaintiff files this complaint to Foreclose the Mortgage, trust deed or other conveyance in the nature of a mortgage (hereunder called "mortgage") hereinafter described and joins the following persons as defendants:

HADI ALI KHAN
AND
SARTAJ KHAN

2. Attached as Exhibit "A" is a copy of the mortgage and as Exhibit "B" is a copy of the Note secured thereby.

3. Information concerning mortgage:

(a) Nature of Instrument: MORTGAGE

(b) Date of Mortgage:

February 8, 1990

(c) Name or names of mortgagors:

HADI ALI KHAN
and
SARTAJ KHAN

(d) Name of mortgagee, trustee or grantee in the mortgage:

BRICKYARD BANK

(e) Date and place of recording or registration:

February 20, 1990
In the office of the Cook County Recorder of Deeds

(f) Identification of recording or registration:

#90-079232

(g) Estate conveyed: Fee Simple

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RECORDED
03/31/92 10:49:00

DEPT-01 RECORDING \$25.50
T02221 TRAM 1019 03/31/92 10:49:00
49124 B *-92-211691
COOK COUNTY RECORDER

25 50/12

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(h) Amount of original indebtedness: \$36,000.00

(i) Legal description of mortgaged premises:

Parcel 1:

Unit 1-"G", Building Number CT 1, in the Norwood Courts Condominium, as delineated on a survey of the following described real estate:

The North 3 feet of Lots 1 and 6 and all of Lots 2 to 5 in Norwood Courts Subdivision of part of the South East 1/4 of the North West 1/4 of Section 6, Township 40 North Range 14 East of the Third Principal Meridian; which survey is attached as Exhibit "A" to the Declaration of Condominium recorded as Document Number 25211651; together with its undivided percentage interest in the common elements, in Cook County, Illinois.

Parcel 2:

Easements for ingress and egress for the benefit of Parcel 1 as set forth in instruments recorded as Document Numbers 15929348 and 15957209, and in the Declaration of Condominium recorded as Document Number 25211651, in Cook County, Illinois.

commonly known as Unit #1 G, 6135 North Seeley Avenue, Chicago, Illinois

Tax Parcel No: 14-06-121-011-1023

(j) Statements as to defaults and amount due: \$32,238.48

The mortgage has been in default since November 10, 1991 with a principal balance due in the amount of \$32,238.48, accrued interest, late charges, attorneys fees and costs.

(k) Name or names of present owners of the premises:

HADI ALI KHAN and SARTAJ KHAN

(l) Name or names of persons, in addition to such owners, or but excluding any non-record claimants, as defined in in subsection (b) of Section 15-103 of this Act, who are joined as defendants and whose equitable right to redeem is sought to be barred:

UNKNOWN OWNERS

UNKNOWN TENANTS

(m) Name or names of persons claimed to be personally liable for deficiency, if a deficiency judgement is prayed for:

HADI ALI KHAN and SARTAJ KHAN

(n) Capacity in which plaintiff brings this action:

Legal holder of the mortgage and note

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(o) Plaintiff seeks inclusion in the judgment of plaintiff's attorneys fees, costs, expenses and interest.

4. Plaintiff avers that in addition to persons designated by name herein and the unknown defendants hereinbefore referred to, there are other persons who are interested in this action and who have or claim some right, title, interest or lien in, to or upon the real estate or some part thereof, in this Complaint described, including, but not limited to unknown owners, unknown holders of notes secured by second mortgages or trust deeds where applicable, unknown beneficiaries of the land trust holding legal title where applicable, unknown spouses where applicable and unknown tenants. The name of such persons is unknown to the plaintiff and on diligent inquiry cannot be ascertained and all such persons are therefore made a party defendants to this action by the name and description of UNKNOWN OWNERS.

WHEREFORE, your plaintiff prays as follows:

1. For foreclosure of such mortgage
2. For a personal deficiency decree
3. For an Award of Attorneys Fees, costs and interest.
4. For the appointment of a receiver after sale in the event of a deficiency.
5. For the appointment of a receiver pendente lite; and
6. For such other and further relief as this Court may deem just and appropriate.

BRICKYARD BANK

BY Max A. Abrams

MAX A. ABRAMS #04791
Attorney for Plaintiff
6676 Lincoln Avenue
Lincolnwood, Illinois 60645
(708) 677-7600

STATE OF ILLINOIS)
COUNTY OF COOK) SS

Max A. Abrams, being first duly sworn, states that he is the attorney for Plaintiff in the above entitled cause and that he is duly authorized to execute this Affidavit in its behalf; that he has read the above and foregoing Complaint and has knowledge of the facts stated therein and that the matters set out therein are true in substance and in fact, except as to those matters therein stated to be on information and belief and as to such matters, he believes them to be true.

Max A. Abrams
MAX A. ABRAMS

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MAIL TO:

MAX A. ABRAMS

6676 LINCOLN AVE.

LINCOLNWOOD, IL. 60645