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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
MUNICIPAL DIVISION - SECOND DISTRICT

#51313

MARTIN L. BIEBEL,
Plaintiff,

-vs-

NADA MILUTINOVIC, BOGDAN
MILUTINOVIC, and LOUISE
STEVANOVICH,

Defendants.

94484966

No. *94 M 2754*

FILED

MAY 25 1994

AURELIA PUCHINSKI
CLERK OF CIRCUIT COURT

AMENDED COMPLAINT

NOW COMES the Plaintiff, MARTIN L. BIEBEL, pro se, and complains against the Defendants, NADA MILUTINOVIC, BOGDAN MILUTINOVIC and LOUISE STEVANOVICH, as follows:

Count I: Breach of Contract

1. The Plaintiff is a duly licensed attorney in the State of Illinois. Plaintiff's principal place of business and residence are located in Glenview, Illinois. The majority of the services performed herein occurred in the Second Municipal District.

2. The Defendants, NADA MILUTINOVIC, BOGDAN MILUTINOVIC and LOUISE STEVANOVICH are the owners of record of a single-family dwelling located at 6726 West Albion in Niles, Illinois with a legal description as follows:

LEGAL DESCRIPTION:

LOT 11 IN THE RESUBDIVISION OF BLOCK FORTY EIGHT (48) OF NORWOOD PARK, BEING ALL IN OF SECTION 6, TOWNSHIP 40 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL, (EXCEPT 30 ACRES OF THE EAST OF THE NORTH HALF (1/2) OF THE NORTHEAST QUARTER (1/4) ALSO PART OF SECTION 31, TOWNSHIP 41 NORTH, RANGE 13, AND PART OF SECTION 7, TOWNSHIP 40 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

PERMANENT INDEX NUMBER: 10-31-402-006

COOK COUNTY
RECORDER
JESSE WHITE
SKOKIE OFFICE

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The Defendants currently live at 2660 Appletree Lane in Northbrook, Illinois.

3. In January, 1993, Defendants hired the Plaintiff to represent them regarding the listing for sale of the property located at 6726 West Albion in Niles, Illinois.

4. Pursuant to this contract, Plaintiff performed a variety of legal services for which there is an outstanding balance for time expended in excess of 48.7 hours at an accepted rate of \$100.00 per hour. Plaintiff has also advanced certain sums of money on behalf of Defendants.

5. Plaintiff has made a demand upon the Defendants to bring said account current and the Defendants have refused to pay.

6 Plaintiff has performed under the agreement between the parties.

WHEREFORE, Plaintiff requests this honorable Court to enter an order granting fees in the amount of \$4,870.00, costs advanced in the amount of \$117.42, interest at the rate of two percent per month and attorney fees.

Count II: Quantum Meruit

7. Plaintiff realleges paragraphs 1 through 6 of Count I as paragraphs 1 through 5 of Count II.

8. Defendant denies that Plaintiff ever quoted the reduced hourly rate of \$100.00 for legal services rendered.

9. Plaintiff's usual and customary hourly rate for the services rendered is \$150.00 per hour

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WHEREFORE, Plaintiff requests this Honorable Court to enter an order granting fees in the amount of \$7,305.00, costs advanced in the amount of \$117.42, interest at the rate of two percent per month and attorney fees.

Respectfully submitted,


MARTIN L. BIEBEL

Property of Cook County Clerk's Office



MARTIN L. BIEBEL
Attorney at Law
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Glenview, Illinois 60025
(708) 724-0061

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