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7/07/01 7 51 001 Page 1 of 3
1998-05-27 13:06:10
Cook County Recorder 25.50

Lia Padena Notice
SPATHES CONSTRUCTION
PLAINTIFF

Court Caption

VS

No. 98CH06937


COLUMBUS ON THE PARK LLC BENEFICIARY
LA SALLE NATIONAL BANK TRUST # 120067
KENARD CORPORATION (Harold Lickerman)
Dennis Seaton
Drapar & Kramer
Defendants

Lia Padena Notice

I, the undersigned, do hereby certify that the above entitled cause was filed in the above Court on the 0th day of July 1997 for foreclosure of Mechanics' Lien and is now pending in said Court and that the property affected by said cause is described as follows:

Legal Description

TO WIT: Vernon Park, Add. in Chicago Being A Sub Of Blks 38,39,44 & 45 in C And Trustee Sub(see A)
REC DATE 10/27/98

Signature: 

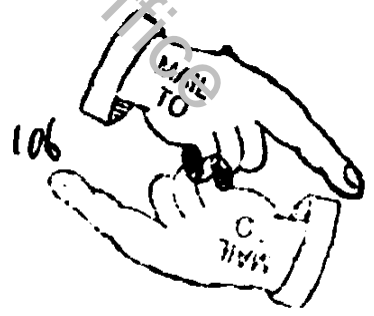
Clerk

This Instrument Prepared By:

SPATHES CONSTRUCTION

PERMANENT # 17 17 314 053 0000

return to: RONALD R GIBSON C/O
ZIVKOVIC DEVELOPMENT
445 WEST LEXIE STREET, SUITE 106
CHICAGO, ILLINOIS 60610



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COUNT III Unjust Enrichment

NOW COMES the Plaintiff, Spothis Construction, and complaining of Defendants Columbus On The Park, La Salle National Bank Trust # 128667, Kennard Corporation, Denis Sexton and Draugher & Krutner, unknown owners, and unknown Lien Claimants states as follows;

- 1-10 The Plaintiff reallges paragraphs 1 through 10 of Count II of this Complaint as paragraphs 1 through 10 of Count III of this complaint
- 11 Plaintiff provided the services incorporated into said premises under the direction, authorization, and permission of Defendant Harold Lickerman (Contractor).
12. Allowing Defendant to retain these improvements to said premises without compensation to Plaintiff would unjustly en- rich Defendant.
13. The Plaintiff has suffered a detriment in the amount of \$73930.00 (seventy-three thousand, nine hundred thirty dollar) for Contract management plus other expenses furnished by Spothis Construction's services provided to said premises and, therefore, seeks recovery of Additional damages in the aforesaid amount plus interest thereon of Five (5) per cent per month any all legal fees associated with this suit or from January 22, 1998.

WHEREFORE, Plaintiff, Spothis Construction, prays that this Court enter judgement in favor of Plaintiff and against Defendant, Harold Lickerman (Contractor) Unknown Owners, and Unknown Lien Claimants, in the amount of \$80,000 (eighty thousand dollars).


COUNT IV (Lender's Liability)

NOW COMES Plaintiff, Spothis Construction, by its assigner and complaining of Defendants ,Columbus On The Park , La Salle National Bank Trust # 128667, Kennard Corporation, Denis Sexton and Draugher & Krutner states as follows;

1. Spothis Construction is a Registered Business in Cook County, State of Illinois engaged in the business as a Construction Manager with its principal office located at 954 West Washington Blvd.
- 1-6The Claimant, Spothis Construction, reallges paragraphs 1 through 10 of Count II of Claimant's Complaint as paragraph 1-6 of Count IV of Claimant's Complaint.
- 2.Spothis Construction has never been paid the balance for the work which it did for Kennard Corporation in accordance with its contract with Kennard Corporation.
- 3 Spothis Construction is entitled to payment in the sum of \$80,000.00 (eighty thousand dollars) from mortgage holder for work done for Harold Lickerman(Kennard Corporation) which sum became due it on January 1998.
4. Although Spothis Construction has demanded payment of the balance due it from Kennard Corporation, it has not received any sums from any source to apply towards the balance of the obligation due it.
5. Spothis Corporation has suffered consequential damages by reason of the wrongful acts of the Defendants, including interest expenses incurred, lost opportunity to take on additional work by reason of this impairment of Spothis Construction's financial resources, legal expenses, and additional operating expenses in the total sum of \$80,000.00 (eighty thousand dollars).

WHEREFORE, the Plaintiff prays that judgement be entered in its favor and against Defendant Kennard Corporation, Harold Lickerman) together with interest thereon, consequential damages, its legal fees and cost incurred herein

William Spothis/ Spothis Construction



William Spothis
President of Spothis Construction

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R O W A R D J R O S E W P C C O O K C O U N T Y T R E A S O R E R
03/19/98 Receipt : 5298 Employee : GARY Page : 1

P I N : 17-17-314-005-0000 Volume : 000592

Address : NONE

Name : NONE

Mailing : NONE

Legal Description :
Sub-Division Name : VERNON PARK ADD TO CHICAGO

Legal : VERNON PARK ADD TO CHICAGO BEING A SUB OF BLS 38,39,44 & 45 IN C
ANAL TRUSTEES SUB (SEK A) REC DATE: 10/17/1859

ST-TN-UG	BLK	PT	INT
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17-39-11	0000008		0000003
17-39-14	0000008		0000001
17-39-14	0000008		0000005
17-39-14	0000008		0000006
17-39-14	0000008		0000007
17-39-14	0000008		0000008

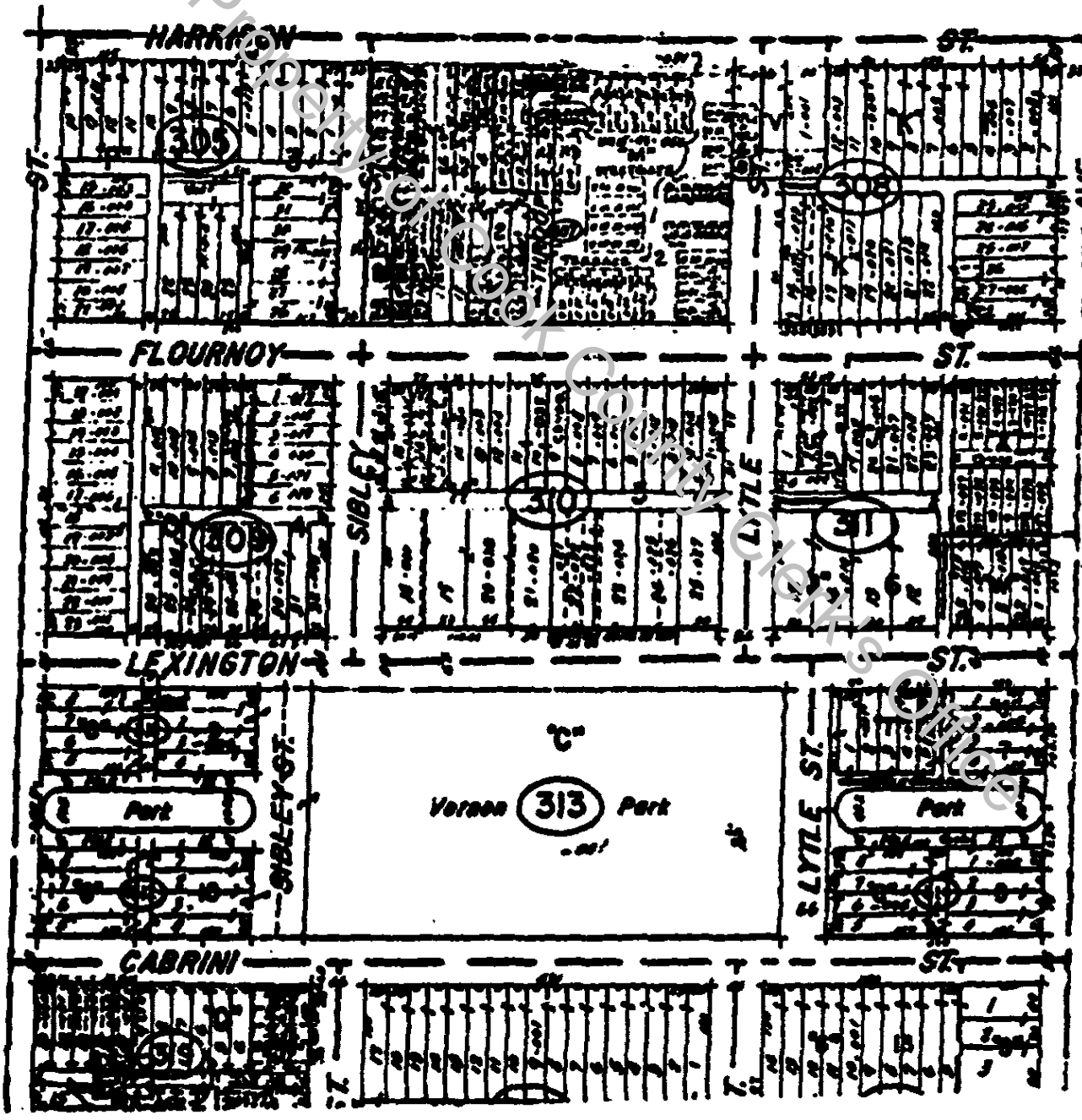
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County Clerk's Office

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E. 1/2 S.W. 1/4 Sec. 17 - 39 - 14 WEST TOWN

31



Small portions of the E. 1/2 of Sec. 17 of T. 39 S. R. 14 W. Sec. 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000.