

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

TIEA-CHIEN CHEN,

Plaintiff,

v.

Case No. 98 C 2369

JOHN T. MATHEWS, DONNA C. MATHEWS,
RODERICK D. BOTHWELL, JULIA BOTHWELL,
RT PARTNERS, an Illinois partnership,
AMERICAN NATIONAL BANK AND TRUST
COMPANY OF CHICAGO, NOT INDIVIDUALLY,
BUT AS TRUSTEE UNDER TRUST AGREEMENT
NUMBER 121506-03, AMERICAN NATIONAL
BANK AND TRUST COMPANY OF CHICAGO,
NOT INDIVIDUALLY, BUT AS TRUSTEE
UNDER TRUST AGREEMENT NUMBER 123431-09,
FIRST NATIONAL BANK OF EVERGREEN PARK,
NOT INDIVIDUALLY, BUT AS TRUSTEE UNDER
TRUST AGREEMENT NUMBER 14269,
AMERICAN NATIONAL BANK AND TRUST
COMPANY OF CHICAGO, FUSION INDUSTRIES,
INC., an Illinois corporation, and FUSION
FULFILLMENT SERVICES, INC., an Illinois
corporation,

Hon. Blanche M. Manning

Defendants.

NOTICE OF FORECLOSURE (LIS PENDENS)

The undersigned certifies that the above-captioned mortgage foreclosure action was filed by Tiew-Chien Chen ("TCC"), on April 16, 1998, and is now pending.

1. The names of all plaintiffs and the case number are identified above.
2. The court in which said action was brought is identified above.
3. The name of the title holder of record is (i) Donna C. Mathews ("Mathews"),

as to the real estate described in Paragraph 4 hereof, (ii) American National Bank and Trust Company of Chicago, not individually, but as Trustee under Trust Agreement dated April 15, 1996, and known as Trust No. 121506-03 ("Trust No. 121506-03"), as to the real estate described in Paragraph 5 hereof (iii) First National Bank of Evergreen Park, not individually, but as Trustee under

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Trust Agreement dated April 6, 1995, and known as Trust No. 14269 ("Trust No. 14269"), as to the real estate described in Paragraph 6 hereof, (iv) American National Bank and Trust Company of Chicago, not individually, but as Trustee under Trust Agreement dated September 12, 1997, and known as Trust No. 123431-09 ("Trust No. 123431-09"), as to the real estate described in Paragraph 7 hereof, and (v) Trust No. 121506-03, as to the real estate described in Paragraph 8 hereof.

4. A legal description of the real estate owned by Donna C. Mathews sufficient to identify it with reasonable certainty is as follows:

Lot 77 in Heritage Knolls Unit 1, being a Subdivision of Part of the East $\frac{1}{2}$ of the Southwest $\frac{1}{4}$ of Section 29 and the West $\frac{1}{2}$ of the Southeast $\frac{1}{4}$ of Section 29, in Township 35 North, Range 12, East of the Third Principal Meridian, Frankfort Township, according to the Plat thereof recorded December 22, 1988 as Document Number R88-61749 and Certificate of Correction recorded June 12, 1989 as Document Number R89-77904, in Will County, Illinois.

Permanent Index No. 09-29-302-003.

Common address or location of the Property: 10809 Ashford, Frankfort, Illinois.

5. A legal description of the real estate owned by Trust No. 121506-03 sufficient to identify it with reasonable certainty is as follows:

That part of Lots 2 and 3 (taken as tract) in Block 11 in Arthur T. McIntosh and Company's Southtown Farms unit number 3, being a Subdivision in fractional Section 28 North and South of the Indian Boundary Line in Township 36 North, Range 13, East of the Third Principal Meridian, lying South and East abutting the following described line; said line being the Southeasterly right of way line of State Route I-57, commencing at the Southwest corner of said Lot 3, thence North westerly on the Southwesterly line of said Lot 3 a distance of 366.21 feet to the point of beginning; thence Northeasterly on a line a distance of 371.0 feet to a point on the Northeasterly line of said Lot 2, said line forming an angle with said Northeasterly line of Lot 2 of 66 degrees, 24 minutes, 29 seconds to the Southeast and also said point being a distance of 344.31 feet Southeasterly on the Northeasterly line of said Lot 2 from the point of intersection of the Northwesterly right of way line of State Route I-57 and the Northeasterly line of said Lot 2, all in Bremen Township, in Cook County, Illinois.

Permanent Index No. 22-28-410-011 and 22-28-410-013.

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Common Address or location of the Property: 17311 Fusion Way, Country Club Hills, Illinois

6. A legal description of the real estate owned by Trust No. 14269 sufficient to identify it with reasonable certainty is as follows:

Lot 113 in Timber Estates Phase 1, being a Subdivision of Part of the West ½ of the Southeast ¼ of Section 27, and the East ½ of the Southwest ¼ of Section 27, Township 36 North, Range 12, East of the Third Principal Meridian, in Cook County, Illinois.

Permanent Index No. 27-27-306-011.

Common Address or location of the Property: 9218 West 175th Street, Tinley Park, Illinois

7. A legal description of the real estate owned by Trust No. 123431-09 sufficient to identify it with reasonable certainty is as follows:

Legal description of the Tinley Park Vacant Property: The South 49.5 feet (except the West 402 feet thereof) in Block 4, in McClary's Subdivision in Section 30, Township 36 North, Range 13, East of the Third Principal Meridian, in Cook County, Illinois.

Permanent Index No. 28-30-301-033

Common Address or location of the Property: 17214 Oak Park Avenue, Tinley Park, Illinois

8. A legal description of the real estate owned by Trust No. 121506-03 sufficient to identify it with reasonable certainty is as follows:

Legal description of the Kankakee Property: A tract of land in Lot 5 in R.O. Danforth Estate Lands, described as follows: commencing at a point on the North Line of the North West ¼ of Section 33, Township 31 North, Range 12, East of the Third Principal Meridian, in Kankakee County, Illinois, said point being 403.5 feet West of the North East corner of the North West ¼ of said Section 33; thence South on a line parallel with the East line of the North West ¼ of said Section 33, 954.6 feet to a pipe located at North right-of-way line of the Indiana, Illinois and Iowa Railroad, now owned and operated by the New York Central Railroad; thence Westerly along said right-of-way, 411.3 feet to a point which is 10 feet Westerly as measured at right angles, from the center line of the New York Central Railroad spur track; thence Easterly and Northerly along said New York

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Central Railroad spur on a line that is 10 feet Westerly from center line of said spur as measured at right angles at a distance of 444.5 feet to a point of tangency of said curve; thence North on a line 10 feet Westerly of and Parallel to center line of said curve, 695.5 feet to the North line of the North West $\frac{1}{4}$ of said Section 33; thence Easterly along North line of the North West $\frac{1}{4}$ of said Section 33 to the place of beginning, in Kankakee County, Illinois.

Permanent Index No. 09-33-102-010.

Common Address or location of the Kankakee Property: 1244 Grinnel Road, Kankakee, Illinois.

9. A common address or description of the location of each parcel of the real estate is set forth above.

10. An identification of the mortgages sought to be foreclosed is as follows:

Name of mortgagor: Donna C. Mathews
Name of mortgagee: Tia-Chien Chen
Date of mortgage: July, 1995
Date and place of recording: Recorded with the Recorder of Deeds of Will County, Illinois, on October 20, 1995
County where recorded: Will County, Illinois.
Identification of recording: Recorded as Document No. R95-80776

Name of mortgagor: American National Bank and Trust Company of Chicago, as Trustee of Trust No. 121506-03
Name of mortgagee: Tia-Chien Chen
Date of mortgage: July, 1995
Date and place of recording: Recorded with the Recorder of Deeds for Cook County, Illinois, on October 12, 1995
County where recorded: Cook County, Illinois.
Identification of recording: Recorded as Document No. 95696135

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Name of mortgagor: First National Bank of Evergreen Park, as Trustee of Trust No. 14269

Name of mortgagee: Tiew-Chien Chen

Date of mortgage: July, 1995

Date and place of recording: Recorded with the Recorder of Deeds for Cook County, Illinois, on October 12, 1995

County where recorded: Cook County, Illinois

Identification of recording: Recorded as Document No. 95696136

Name of mortgagor: First National Bank and Trust Company of Chicago, as Trustee of Trust No. 123431-09 (successor to American National Bank and Trust Company of Chicago, as Trustee of Trust No. 121506-03)

Name of mortgagee: Tiew-Chien Chen

Date of mortgage: September 15, 1997

Date and place of recording: Recorded with the Recorder of Deeds for Cook County, Illinois, on September 22, 1997

County where recorded: Cook County, Illinois

Identification of recording: Recorded as Document No. 97699547

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Name of mortgagor: American National Bank and Trust Company of Chicago, as Trustee of Trust No. 121506-03

Name of mortgagee: Tiew-Chien Chen

Date of mortgage: September 15, 1997.

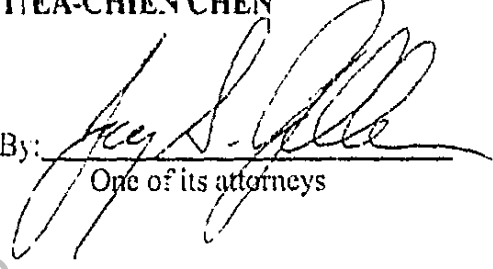
Date and place of recording: Recorded with the Recorder of Deeds for Kankakee County, Illinois, on September 26, 1997.

County where recorded: Kankakee County, Illinois.

Identification of recording: Recorded as Document No. 9716238

Respectfully submitted,

TIEA-CHIEN CHEN

By: 
One of its attorneys

Dated: April 20, 1998

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