

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

THE UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil No. 08-cv-3734
	)	Judge Zagel
WOLFGANG H. SCHUBERT, et al.	)	Magistrate Judge Shenkier
	)	
Defendants.	)	

UNCONTESTED MOTION FOR ENTRY OF JUDGMENT

The plaintiff United States of America by its undersigned attorney, submits herewith a proposed judgment, and moves this Court for an entry of judgment in favor of the United States of America and against Wolfgang H. Schubert in the amount of \$189,926.40, plus statutory accruals that have accrued and may continue to accrue from January 8, 2010, and for foreclosure of its federal tax lien on Wolfgang Schubert’s interest in the property commonly known as 25533 West Wilson Avenue, Wauconda, Illinois 60084 (“25533 West Wilson”), and more specifically described in the Second Amended Complaint (docket # 21). In support of this motion, the United States of America represents as follows:

1. The requested judgment is consistent with the terms of a stipulation entered into by the United States, Wolfgang Schubert, and Matrix Financial Services Corporation, and filed with the Court on March 23, 2010 at docket # 25.<sup>1</sup>

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<sup>1</sup>Mr. Schubert signed the stipulation on the Certificate of Service page rather than the signature page. *See Attached Decl. of Raagnee Beri; March 17, 2010 Letter to Wolfgang Schubert.*

2. The undersigned attorney for the United States has conferred with Michelle Kramer Schindler, attorney for defendant Matrix Financial Services Corporation, and she has indicated that Matrix Financial Services Corporation will not oppose the present motion.

3. The undersigned attorney for the United States has conferred with defendant Wolfgang Schubert, *pro se*, and he has indicated that he will not oppose the present motion.

WHEREFORE, the United States of America requests that the Court enter judgment in favor of the United States of America and against Wolfgang H. Schubert in the amount of \$189,926.40, plus statutory accruals that have accrued and may continue to accrue from January 8, 2010, and for foreclosure of its federal tax lien on Wolfgang Schubert's interest in the property commonly known as 25533 West Wilson Avenue, Wauconda, Illinois 60084, and more specifically described in the Second Amended Complaint (docket # 21).

Respectfully submitted,

PATRICK J. FITZGERALD  
United States Attorney

/s/ Raagnee Beri  
RAAGNEE BERI  
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CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that on March 23, 2010, the foregoing UNCONTESTED MOTION FOR ENTRY OF JUDGMENT was filed with the Court using the Court's CM/ECF system, which will send notice to the following CM/ECF participants:

Michelle Kramer Schindler  
Dykema Gossett PLLC IL  
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IT IS HEREBY CERTIFIED that service of the foregoing UNCONTESTED MOTION FOR ENTRY OF JUDGMENT has been made upon the following by depositing a copy in the United States mail, postage prepaid, this 23 day of March, 2010:

Wolfgang H. Schubert  
25533 West Wilson Avenue  
Wauconda, Illinois 60084

Village of Mundelein  
c/o Esmie Dahlstrom, Village Clerk  
440 West Hawley Street  
Mundelein, Illinois 60060

/s/ Raagnee Beri  
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