

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	Civil No. 08-cv-3751
)	
v.)	Hon. James W. Gettleman
)	
DANIEL W. HARTWIG; HARRIS N.A.,)	
<i>as successor trustee to HARRIS BANK</i>)	
ROSELLE UTS, <i>dated June 25, 1979 a/k/a</i>)	
<i>trust #11059; and JPMORGAN CHASE</i>)	
BANK, NATIONAL ASSOCIATION;)	
)	
Defendants.)	

**UNITED STATES' UNCONTESTED MOTION
FOR ENTRY OF FINAL JUDGMENT**

The plaintiff, the United States of America, by its undersigned counsel, requests the entry of a final judgment, and states as follows:

1. In this case, the United States' Complaint includes (1) a claim seeking judgment that Daniel W. Hartwig is liable to it based on unpaid federal income tax assessments, and (2) a claim to foreclose federal tax liens that have attached to real property located at 1021 Helene Lane, Schaumburg, Illinois, 60193 ("the Real Property").

2. Both defendant Daniel W. Hartwig and defendant Harris N.A. failed to answer or otherwise defend in this action; their defaults have been entered on the docket.

3. JPMorgan Chase Bank, National Association, answered the Complaint on December 31, 2008 and asserted its interest in the real property as the owner and legal holder of a Mortgage dated November 7, 1991, and recorded November 21, 1991, in the records of the Cook County Recorder of Deeds Office. The Defendant, JPMorgan Chase Bank, National Association, asserted in its Answer that it had insufficient knowledge to admit or deny the allegations surrounding the lien claim of the United States.

4. The United States agrees that JPMorgan Chase Bank, National Association, has a

valid lien on the Real Property, which is superior to the United States' lien.

5. JPMorgan Chase Bank, National Association, does not object to the entry of judgment in this matter.

WHEREFORE, the plaintiff United States requests the entry of judgment, as set forth in the proposed judgment submitted to this Court.

PATRICK J. FITZGERALD
United States Attorney

/s/ Gabrielle G. Hirz
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CERTIFICATE OF SERVICE

I certify that on October 16, 2009, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to:

KATIE WHITEHEAD
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/s/ Gabrielle G. Hirz
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