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

MASON DIXON INTERMODAL, INC.,)	
a Michigan Corporation,)	
Plaintiff,)	Case No. 08 CV 6271
v.)	Judge Shadur
)	
RNR TRANSPORTATION, INC.,)	Magistrate Judge Denlow
an Illinois Corporation,)	
SCOTT RINGEL, an individual, and)	
KIMBERLY ROEBKE, an individual,)	
Defendants.)	

MOTION FOR JUDGMENT ON ANSWER OF THIRD PARTY CITATION RESPONDENT, J.P. MORGAN CHASE & CO.

NOW COMES the Plaintiff/Judgment Creditor, Mason Dixon Intermodal, Inc. ("MDII"), by and through its attorneys, Sullivan Hincks & Conway, and hereby moves this Honorable Court to enter Judgment against and order Third Party Citation Respondent, J.P. Morgan Chase & Co. ("Chase"), to turn over certain assets of the judgment debtors, Kimberly Roebke and RNR Transportation, Inc. In support thereof, MDII states as follows:

- 1. On January 28, 2009, Judgment was entered in favor of MDII and against Kimberly Roebke, RNR Transportation, Inc. and Scott Ringel, jointly and severally in the amount of \$803,134.48. As of the date of this motion, the full amount of the judgment is still due and owing, and no part of it has been paid or satisfied and MDII is still the owner of the judgment.
- 2. MDII served a Citation to Discover Assets upon, among others, Chase, said date of service being March 2, 2009, a copy of the citation is attached hereto and marked as Exhibit "1".

MDII received a written response from Chase, attached hereto as Exhibit 3.

"2", stating that Defendants have on deposit several thousand dollars under the name of

Kimberly Roebke.

In conducting further investigation, MDII discovered that amounts 4.

currently held in Chase Account Number 751945662 are amounts owned by a non-party

to this lawsuit and are not amounts owned by any party to this lawsuit.

MDII is entitled to the non-exempt property of the judgment debtors, RNR 5.

Transportation, Inc. and Kimberly Roebke, to satisfy the Judgment entered against said

judgment debtors in favor of MDII.

WHEREFORE, Plaintiff Mason Dixon Intermodal, Inc. prays that this Court enter

Judgment against and order Third Party Citation Respondent, J.P. Morgan Chase & Co.

to turn over to the Plaintiff, Mason Dixon Intermodal, Inc. the property of the judgment

debtor described on the attached proposed Order and for such other and further relief as

this Court deems just and reasonable.

Respectfully submitted,

Mason Dixon Intermodal, Inc.

By: /s/ Matthew P. Barrette

One of Its Attorneys

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