

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

ALLIANT SOUTHSIDE, LLC,,)	
)	
Plaintiff,)	
)	
vs.)	
)	
SOUTHSIDE PRESERVATION)	
PORTFOLIO, LLC, an Illinois Limited)	No. 09-CV-05594
Liability Company, THE CHICAGO)	
COMMUNITY LOAN FUND, an Illinois not)	Judge Joan B. Gottschall
for profit corporation, WOODLAWN)	
COMMUNITY DEVELOPMENT)	
CORPORATION, an Illinois not for profit)	
corporation,)	
)	
Defendants.)	

RENEWED MOTION FOR ENTRY OF CONSENT JUDGMENT OF FORECLOSURE

Plaintiff, Alliant Southside, LLC (“Alliant”) through its attorneys, Foley & Lardner, LLP, for its Renewed Motion for Entry of a Consent Judgment of Foreclosure pursuant to stipulation, states as follows:

1. On March 9, 2010, Alliant filed its Motion for Entry of Consent Judgment of Foreclosure (“Motion”), requesting that the Court enter a judgment of consent foreclosure based upon a stipulation signed by defendant/borrower Southside Preservation Portfolio, LLC (“Southside”). (Dkt. # 65.) At hearing on March 18, 2010, Southside objected to entry of the consent judgment and requested a briefing schedule, which the Court granted. (Dkt. # 67.)
2. Alliant herein incorporates and renews its original Motion.
3. Following the hearing Alliant and Southside engaged in further negotiations and came to an agreement that has been formalized in an Amendment to the Forbearance and Settlement Agreement (“Agreement”), which the parties have agreed shall remain confidential.

4. Pursuant to the Agreement and the Supplemental Stipulation Relating to Motion for Consent Foreclosure Judgment (“Supplemental Stipulation”), which is attached hereto as Exhibit 1, Southside waives its opposition to the entry of consent judgment.

5. Because Southside no longer has any objection, Alliant is entitled to entry of consent judgment of foreclosure.

6. Attached as Exhibit 2 is a proposed Judgment of Consent Foreclosure (“Judgment”) for execution by the Court.

7. Under Illinois foreclosure law, absolute title free and clear of all claims, liens and interest of Southside and all other parties will immediately vest in Alliant upon the entry of the consent judgment. 735 ILCS 5/15-1402. In order to be able to record the Judgment with the Office of the Recorder of Cook County, Alliant must present an original signed copy to the Recorder. As a result, Alliant requests that the Court allow Alliant to present a duplicate original copy of the Judgment for the Court to execute at the hearing on this Renewed Motion.

WHEREFORE, Alliant respectfully requests that this Court grant its Renewed Motion for Entry of a Consent Foreclosure, pursuant to the attached Supplemental Stipulation and strike the briefing schedule set by order of March 18, 2010.

Dated: April 9, 2010

Respectfully submitted,

ALLIANT SOUTHSIDE, LLC,

By: /s/ William J. McKenna
One of Its Attorneys

William J. McKenna, Jr., #3124763
Jill L. Murch, #6257217
Dean Victor, #6210334
Foley & Lardner LLP
321 North Clark Street, Suite 2800
Chicago, IL 60654-5313
Ph. 312.832.4500
Fax: 312.832.4700