

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

RBS CITIZENS, N.A. d/b/a)	
CHARTER ONE BANK, a)	
National Banking Association,)	
)	Case No. 1:09-cv-5661
Plaintiff,)	Hon. Morton Denlow
)	
- vs -)	
)	
HUAYANG LI, an individual,)	
)	
Defendant.)	

PLAINTIFF’S MOTION
FOR JUDGMENT OF FORECLOSURE

NOW COMES the Plaintiff, RBS Citizens, N.A. d/b/a Charter One Bank (“RBS Citizens, N.A.”), by and through its undersigned attorneys, and in support of its Motion for Judgment of Foreclosure, states:

1. Plaintiff initiated these proceedings on September 11, 2009, seeking foreclosure against Defendant Huayang Li, individually.
2. Huayang Li was served with a copy of the Summons and Complaint on November 24, 2009.
3. More than twenty (20) days has elapsed since the Defendant was served, and he has failed to answer, plead, or otherwise defend the allegations of the Plaintiff’s Complaint.
4. The Defendant’s failure to defend and deny the allegations of Plaintiff’s Complaint results in those allegations being admitted and Plaintiff therefore moves the Court for the entry of a Judgment of Foreclosure against Defendant.

WHEREFORE, the Plaintiff, RBS Citizens, N.A., hereby respectfully requests that this Court enter a Judgment of Foreclosure against the Huayang Li, individually, and

schedule a hearing so the Plaintiff may present proofs in support of the entry of a Judgment of Foreclosure against the Defendant.

/s/ Steven H. Mora
Simon, Galasso & Frantz, LLC
One South Dearborn, Ste. 2100
Chicago, IL 60603
(312) 212-4202 - Office
smora@sgfattorneys.com
Attorneys for RBS Citizens, N.A.
d/b/a Charter One Bank

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