

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
CIVIL DIVISION**

F09040013

LNV Corporation

Plaintiff,

-vs.-

Martha C. Segovia;

Victor Segovia aka Victor I. Segovia;

Defendant.

Case No.: 1:10-cv-00909

Hon. Judge Amy J. St. Eve

PLAINTIFF'S MOTION FOR JUDGMENT ON COUNT FOR REFORMATION

NOW COMES the Plaintiff, (Mortgagee), by Freedman Anselmo Lindberg, LLC, one of its attorneys, and moves this Honorable Court for entry of Judgment on Count II of the Complaint for Reformation of Mortgage. In further support thereof, Plaintiff states as follows:

1. There is no genuine issue of material fact as to Count for Reformation and no party is disputing that Plaintiff should not have the relief granted as set forth in said count.

WHEREFORE, the Plaintiff respectfully requests that this Court enter a Judgment on Count II for Reformation of the Mortgage to correct the legal description as follows:

LOTS 27 AND 28 IN BLOCK 1 IN FREDERICK H. BARTLETT'S THIRD ADDITION TO GREATER 79TH STREET SUBDIVISION, BEING A SUBDIVISION OF THE SOUTHEAST 1/4 OF THE NORTHWEST 1/4 OF THE SOUTHEAST 1/4 AND THE EAST 1/2 OF THE SOUTHWEST 1/4 OF THE SOUTHEAST 1/4 OF SECTION 28, TOWNSHIP 38 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

Respectfully submitted,

By: /s/ Douglas A. Oliver

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