

# **EXHIBIT A**

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

INLAND MORTGAGE CAPITAL )  
CORPORATION, a Maryland corporation, )

Plaintiff, )

vs. )

BLUE DIAMOND PARTNERS, LLC, a )  
Nevada limited liability company, CHARLES )  
ROTKIN, an individual, DAVID ROTKIN, an )  
individual, KEVIN GOLSHAN, an individual, )  
and GERALDINE A. WEBER, an individual, )

Defendants. )

Case No. 11-cv-277

Hon. Harry D. Leinenweber

Mag. Judge Sidney I. Schenkier

**STIPULATED CONSENT JUDGMENT**

This matter coming before the Court upon the stipulation of the parties, Plaintiff Inland Mortgage Capital Corporation (“Plaintiff”), and Defendants Charles Rotkin, David Rotkin, Kevin Golshan and Geraldine A. Weber (collectively, “Defendants”), the parties having agreed to resolve the above-captioned case for the amount set forth herein, and, therefore, good cause having been shown for the entry of this Stipulated Consent Judgment,

**IT IS HEREBY ORDERED THAT:**

1. Judgment is entered in favor of Plaintiff and against Defendant Charles Rotkin in the amount of **TWO HUNDRED THOUSAND DOLLARS AND NO CENTS (\$200,000.00)**;
2. Judgment is entered in favor of Plaintiff and against Defendant David Rotkin in the amount of **TWO HUNDRED THOUSAND DOLLARS AND NO CENTS (\$200,000.00)**;
3. Judgment is entered in favor of Plaintiff and against Defendant Kevin Golshan in the amount of **TWO HUNDRED THOUSAND DOLLARS AND NO CENTS (\$200,000.00)**;

4. Judgment is entered in favor of Plaintiff and against Defendant Geraldine A. Weber in the amount of **TWO HUNDRED THOUSAND DOLLARS AND NO CENTS (\$200,000.00)**;

5. The judgments set forth above are not joint and several, but each is instead separately enforceable in its full amount against the Defendant against whom it is entered;

6. As to Defendant Blue Diamond Partners, LLC, only, the Plaintiff's claims are voluntarily dismissed;

7. Plaintiff will forbear from enforcement of this Stipulated Consent Judgment for a period of three (3) years from the entry of this Stipulated Consent Judgment;

8. Each judgment will accrue interest at a rate of seven percent (7%) *per annum* starting from the date of the entry of this Stipulated Consent Judgment, but Plaintiff agrees to waive its right to collect such interest from any Defendant who, within the three-year forbearance period, pays the principal amount of the judgment entered against him or her;

9. The Court will retain jurisdiction over this matter solely to enforce the terms of this Stipulated Consent Judgment.

ENTERED:

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District Court Judge

*[parties' approvals on following page]*

**APPROVED AS TO FORM AND SUBSTANCE:**



\_\_\_\_\_  
William J. McKenna, Jr. (#3124763)  
Thomas C. Hardy (#6294305)  
Lauren M. Loew (#6293248)  
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\_\_\_\_\_  
Charles Rotkin

Date: \_\_\_\_\_

*Counsel for Plaintiff*

Date: 6/28/2011

\_\_\_\_\_  
David Rotkin

Date: \_\_\_\_\_



\_\_\_\_\_  
Kevin Golshan

Date: \_\_\_\_\_

5/5/11

\_\_\_\_\_  
Geraldine A. Weber

Date: \_\_\_\_\_

Prepared by:

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*Counsel for Plaintiff*

Date: \_\_\_\_\_

  
\_\_\_\_\_  
Charles Rotkin

Date: \_\_\_\_\_

\_\_\_\_\_  
David Rotkin

Date: \_\_\_\_\_

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Kevin Golshan

Date: \_\_\_\_\_

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Geraldine A. Weber

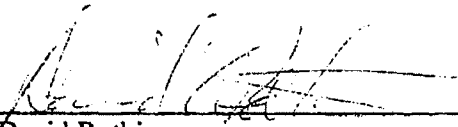
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*Counsel for Plaintiff*  
  
Date: \_\_\_\_\_

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Charles Rotkin  
  
Date: \_\_\_\_\_  
  
  
\_\_\_\_\_  
David Rotkin  
  
Date: 5-5-11

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Kevin Golshan  
  
Date: \_\_\_\_\_

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Geraldine A. Weber  
  
Date: \_\_\_\_\_

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\_\_\_\_\_  
Charles Rotkin

Date: \_\_\_\_\_

\_\_\_\_\_  
David Rotkin

Date: \_\_\_\_\_

\_\_\_\_\_  
Kevin Golshan

Date: \_\_\_\_\_

*Geraldine A. Weber*  
\_\_\_\_\_  
Geraldine A. Weber

Date: \_\_\_\_\_

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