

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

The Bank of New York Mellon Trust	)	
Company, National Association, as grantor	)	
Trustee of the Protium Master Grantor Trust,	)	
	)	
<i>Plaintiff,</i>	)	Case Number: 11 CV 05905
-vs.-	)	District Judge: Honorable John Tharp
	)	Magistrate Judge: Jeffrey Cole
Michael A. James, Non-Record Claimants	)	
Unknown Owners	)	
<i>Defendants</i>	)	

**MOTION FOR JUDGMENT**

NOW COMES the Plaintiff, by and through its Attorneys, Jaros, Tittle & O'Toole, Limited and moves this Court for the entry of a judgment of foreclosure and sale and appointment of selling officer, and, in support of its position, states as follows:

1. That this Court has previously entered summary judgment in this cause
  
2. That Plaintiff has previously submitted an Affidavit of Amounts Due in connection with said Motion
  
3. That said affidavit sets forth the following amounts as due:

Principal Balance due as of Default	\$844,629.48
Accrued Interest thereon to <b>August 1 2012</b>	\$261,694.40
Accrued Late Charges	\$8,132.00
Advances for:	
Property Inspections	\$347.00
BPO's	\$585.00
Real Estate Taxes	\$20,005.79
Hazard Insurance	\$11,921.00
Escrow Credit applied November 25 2008	\$(8,883.52)

Escrow Credit applied November 25 2008  
Funds in suspense for benefit of borrower

\$(253.12)  
\$(18,365.38)

4. That by virtue of the above, plaintiff is entitled, pursuant to Section 15-1506(a) of the Illinois Mortgage Foreclosure Law (S.H.A. 735 ILCS 5/15-1506(a)), to a Judgment of Foreclosure and Sale and appointment of Selling Officer.

WHEREFORE, Plaintiff prays for the entry of a judgment of foreclosure and sale.

*James E. Trausch*

Signed-One of its Attorneys

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