

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, WESTERN DIVISION

Keith Robins and Christine Robins

Plaintiff,

No. 12 CV 3086

vs

PNC Bank, N.A. and National City Mortgage Company

Defendants.

PNC Bank, N.A., successor to National City Bank

Counter-Plaintiff,

vs

Keith Robins; Christine Robins; and Rockford Bell Credit
Union

Counter-Defendants,

MOTION FOR JUDGMENT OF FORECLOSURE AND SALE

NOW COMES the Counter-Plaintiff, PNC Bank, National Association, successor to National City Bank, by its attorneys CROWLEY & LAMB, P.C., and moves the Court for the entry of a Judgment of Foreclosure and Sale in its favor and against the Counter-Defendant(s):

Keith Robins, Christine Robins, and Rockford Bell Credit Union, and as grounds thereof state:

As appears from the Affidavit of Counter-Plaintiff placed on file in support of this Motion, and from the pleadings and admissions on file, there is no genuine issue as to any material fact, and the Counter-Plaintiff is entitled to a Judgment of Foreclosure and Sale in this case as a matter of law.

PNC Bank, National Association, successor to National
City Bank

By: /s/ Christina M. Ripley
One of Its Attorneys

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