

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

The Bank of New York Mellon f/k/a The)	
Bank of New York as successor trustee for)	
JPMorgan Chase Bank, N.A., as Trustee for)	Case No: 1:12-cv-7767
the Benefit of the Certificateholders of Equity)	
One ABS, Inc. Mortgage Pass-Through)	
Certificates Series 2004-1,)	
Plaintiff,)	
V.)	Judge: Robert W. Gettleman
Robert D. Banks; Arrow Financial Services)	
LLC; Midland Credit Management, Inc;)	
Shona L. Banks,)	
Defendants.)	

**PLAINTIFF’S MOTION FOR JUDGMENT OF FORECLOSURE AGAINST ARROW
FINANCIAL SERVICES LLC**

NOW COMES Plaintiff The Bank of New York Mellon f/k/a The Bank of New York as successor trustee for JPMorgan Chase Bank, N.A., as Trustee for the Benefit of the Certificateholders of Equity One ABS, Inc. Mortgage Pass-Through Certificates Series 2004-1, by and through its attorneys Potestivo & Associates, PC., and hereby requests this Honorable Court enter a Judgment of Foreclosure against Arrow Financial Services LLC. In support thereof, Plaintiff states as follows:

1. On August 19, 2014 Arrow Financial Services LLC (“Arrow”) was defaulted for their failure to answer Plaintiff’s Complaint.
2. As a result, all allegations in Plaintiff’s Complaint are taken as true as against Arrow.
3. Arrow’s lien/interest is subordinate and inferior to the lien of the Plaintiff’s.
4. Therefore, Plaintiff seeks a Judgment of Foreclosure be entered against Arrow Financial Services, eliminating their lien against the property located at 2136 Hagen Lane, Flossmor, Illinois.

WHEREFORE, Plaintiff respectfully requests the Court enter a Judgment of Foreclosure against Arrow Financial Services LLC.

Respectfully submitted,
/s/ Megan Christine Adams

Potestivo & Associates, P.C.
Megan C. Adams (ARDC# 6312221)
223 W. Jackson Blvd., Suite 610
Chicago, Illinois 60606
Telephone: (312) 263-0003
Main Fax: (312) 263-0002
Cook County Firm ID #: 43932
DuPage County Firm ID #: 223623
Attorneys for Plaintiff
Our File No.: C13-91829